

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,	:	22-CV-01032 (PKC)
	:	
Plaintiff,	:	
	:	
	:	United States Courthouse
-against-	:	Brooklyn, New York
	:	
	:	
SAFA ABDULRAHIM GELARDI, ET	:	Wednesday, May 29, 2024
AL.,	:	9:30 a.m.
	:	
Defendant.	:	

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TRANSCRIPT OF CIVIL CAUSE FOR EVIDENTIARY HEARING  
BEFORE THE HONORABLE PAMELA K. CHEN  
UNITED STATES DISTRICT JUDGE

A P P E A R A N C E S:

For the Plaintiffs: SAGE LEGAL LLC  
18211 Jamaica Avenue  
Jamaica, New York 11423  
BY: EMANUEL KATAEV, ESQ.

MILMAN LABUDA LAW GROUP PLLC  
300 Marcus Avenue  
Suite 3w8  
Lake Success, New York 11042  
BY: JAMIE FELSEN, ESQ.

For the Defendants: WARNER & SCHEUERMAN  
6 West 18th Street  
10th Floor  
New York, New York 10011  
BY: JONATHON WARNER, ESQ.



1 (In open court.)

2 (Judge PAMELA K. CHEN enters the courtroom.)

3 THE COURTROOM DEPUTY: All rise.

4 THE COURT: Everyone can have a seat.

5 THE COURTROOM DEPUTY: Civil Cause for Evidentiary  
6 Hearing, Docket Number 22-CV-1032, IME Watchdog, Inc. versus  
7 Gelardi, et al.

8 Will the parties please state their appearances for  
9 the record, starting with plaintiff.

10 MR. KATAEV: Good morning, Your Honor.

11 Emanuel Kataev of Sage Legal LLC for the plaintiff  
12 IME Watchdog.

13 THE COURT: Okay.

14 MR. FELSEN: Good morning, Your Honor.

15 Jamie Felsen from Milman Labuda Law Group for the  
16 plaintiff.

17 THE COURT: All right.

18 MR. FELSEN: And I just want to introduce the  
19 client, Daniella Levi, Ellie Levi, and Carlos Roa.

20 THE COURT: All right.

21 Good morning to all of you.

22 MR. WARNER: Good morning, Your Honor.

23 Jonathon Warner of Warner & Scheuerman for the  
24 defendants.

25 And to my right are the defendants, Safa Abdulrahim



1 Gelardi and Vito Gelardi.

2 THE COURT: All right. Good morning to all of you  
3 as well.

4 MS. GELARDI: Good morning.

5 MR. GELARDI: Good morning.

6 THE COURT: So as everyone knows, we are here for a  
7 hearing on multiple issues. We have tried through the docket  
8 orders to lay out, I guess, what I expect to hear evidence or  
9 testimony about and to set some time limits.

10 So we obviously have a very compressed schedule.  
11 Why don't we get right to it.

12 Mr. Kataev, why don't you begin by calling your  
13 witnesses, since principally you have a couple of motions,  
14 affirmative motions, that we are having this hearing about,  
15 including the motion for attachment, right, as well as the  
16 motion for contempt, which, obviously, has some age on it at  
17 this point, but was interrupted because of, I think,  
18 settlement negotiations at one point and then there has been a  
19 flurry of activity in between.

20 But why don't we start with your witnesses.

21 MR. KATAEV: The first witness we'll call is  
22 defendant Safa Gelardi.

23 THE COURT: Okay.

24 MR. FELSEN: Your Honor, before we get started.

25 THE COURT: Okay.



1 MR. FELSEN: To the extent any witnesses appear in  
2 the courtroom, we'd ask that they be sequestered during the  
3 proceeding.

4 THE COURT: Okay.

5 So, other than interns, I think, from our  
6 courthouse, I think there is one gentleman in a plaid shirt.  
7 Is he a potential witness?

8 MR. FELSEN: No, Your Honor, that's --

9 THE COURT: We do not need to exclude him?

10 MR. FELSEN: No.

11 THE COURT: So if anyone sees a potential witness or  
12 someone they do not know come into the courtroom, alert me and  
13 then we will have that person leave, if they are a witness.  
14 So both sides should observe that rule, all right?

15 Mr. Kataev, are you ready?

16 MR. KATAEV: Yes.

17 I just wasn't sure if you wanted to know all the  
18 witnesses that we'll be calling or just the first one?

19 THE COURT: I have the witness list, so if you are  
20 deviating from that, there is no need. Just go ahead and  
21 start with your first witness.

22 MR. KATAEV: Okay.

23 Plaintiff calls Safa Gelardi.

24 THE COURT: Okay.

25 Ms. Gelardi, you will take the stand.



1           Let me note that both parties seek to call some of  
2 the same witnesses, including Ms. Gelardi.

3           Go ahead and make your way up here.

4           I think for efficiency's sake, we should have that  
5 witness questioned while they are on the stand, whether it is  
6 by the plaintiff, in their case, or the defendants, in their  
7 case.

8           So, Mr. Warner, I will expect that you will question  
9 as well if you were going to call Ms. Gelardi.

10          MR. WARNER: Thank you so much, Your Honor.

11          THE COURT: Okay.

12          So Ms. Gelardi, if you will remain standing for one  
13 moment so you can be sworn in.

14          (Witness takes stand.)

15          THE COURTROOM DEPUTY: Please raise your right hand.

16          **SAFA GELARDI,**

17               called as a witness having been

18               first duly sworn, was examined and testified

19               as follows:

20          THE COURTROOM DEPUTY: Please state and spell your  
21 name for the record.

22          THE WITNESS: Safa Gelardi, S, like Sam, A-F, like  
23 Frank, A, G-E-L-A-R-D-I.

24          THE COURT: You may inquire, Mr. Kataev.

25          ///



S. Gelardi - direct - Kataev

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1 DIRECT EXAMINATION

2 BY MR. KATAEV:

3 Q Good morning, Ms. Gelardi.

4 A Good morning.

5 Q IME Companions is currently closed, correct?

6 A It's currently not in business, if that's some -- maybe a  
7 better way to put it.

8 Q And that's as a result of the March 27, 2023, expanded  
9 preliminary injunction, correct?

10 A It's a result of more than one thing. It's a result of  
11 slander. It's a result of the hearing. It's a -- it's a  
12 result of more than one thing.

13 Q You recognize that on March 27, 2023, and with respect to  
14 prior orders, this Court issued an order that you must comply  
15 with, correct?

16 A Correct.

17 Q And that is the main reason why IME Companions is no  
18 longer in business, correct?

19 A No. The main reasons is it's no longer in business is  
20 slander. We would have probably continued to try to get new  
21 clients, but I feel like maybe your -- your clients were  
22 working overtime on just slandering me, my name, my business.  
23 I think that's what kind of put me out more.

24 MR. KATAEV: I'm going to present what's been marked  
25 for identification is Plaintiffs' Exhibit 1.



S. Gelardi - direct - Kataev

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1 (Exhibit published.)

2 THE COURT: Can you see that, Ms. Gelardi?

3 THE WITNESS: Yes, ma'am. Yes, Your Honor.

4 THE COURT: So there are some binders with the  
5 printed materials or exhibits in front of you if you need to  
6 see them.

7 THE WITNESS: All right.

8 THE COURT: Yes. Go ahead and access those if you  
9 like.

10 MR. KATAEV: Binder Number 1, Exhibit Tab 1.

11 THE WITNESS: Okay.

12 MR. KATAEV: While you are opening it up, I will  
13 represent to you on the record that this is a declaration that  
14 you signed on or about April 28th of 2023.

15 THE WITNESS: Okay.

16 MR. KATAEV: I just want you to focus on the first  
17 exhibit tab only, please.

18 THE WITNESS: Okay.

19 BY MR. KATAEV:

20 Q Do you recognize this declaration?

21 A You said -- you said April of 2023?

22 Q That's correct.

23 If you go to page 4, that's your signature there,  
24 correct?

25 A Yes.



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1 Q Okay.

2 MR. KATAEV: I'd like to offer into evidence  
3 Plaintiff's Exhibit 1.

4 THE COURT: Well, I do not think you need to offer  
5 it into evidence. If you are using it to impeach her, go  
6 ahead and impeach her.

7 MR. KATAEV: Okay.

8 THE COURT: And I was going to comment that you are  
9 not really handling this properly, but I want to expedite  
10 things. So ask her the question that relates to what I assume  
11 is a prior inconsistent statement?

12 Q In paragraph 4 of your declaration, you state: We sold  
13 the website after shutting down IME Companions in response to  
14 this Court's decision to expand the amended preliminary  
15 injunction.

16 Is that right?

17 A That is correct. It was one of the reasons that we were  
18 no longer in business.

19 Q This declaration says nothing of slander, correct?

20 A Well, there would have to be evidence or proof of who's  
21 slandering. So we didn't have proof so we didn't enter it.

22 MR. KATAEV: I'd like to present what's been -- I'd  
23 like to present an exhibit that's been marked for  
24 identification as Exhibit 33.

25 (Exhibit published.)



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1 MR. WARNER: I'm sorry, Judge.

2 Q Ms. Gelardi, I'll represent to you that this is an email  
3 that your counsel sent in response to an inquiry by the  
4 plaintiff of alleged violations of the orders in this case.

5 Do you recognize this document?

6 A I'm sorry. What is your question?

7 Q Do you recognize this email?

8 A You have to understand that there's been thousands upon  
9 thousands of emails, so they all look the same; but I -- I do  
10 know this email. I'm assuming -- I mean, this is last year.  
11 They all look the same, but what is your question about it?

12 Q In this email, your attorney says that you shut down your  
13 business and dismantled your website, correct?

14 A I have told my attorney I'm dismantling my website and I  
15 am shutting down the business.

16 MR. KATAEV: Referring to page 6 of Exhibit 33.

17 Q This is a letter that you received by and through your  
18 counsel concerning alleged violations of the orders, correct?

19 A If you say so. Again, they all look the same to me.

20 Q Did your attorney provide you with this letter?

21 A My attorney provided me with everything. Sometimes  
22 they're hard to look at because it just heightens my anxiety  
23 and I kind of like, just have him explain everything to me.

24 Q In this letter we asked you for a sworn statement  
25 confirming that you're in compliance with the Court's



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1 injunction, correct?

2 MR. WARNER: Objection, Your Honor.

3 What's the relevance of statements made in my letter  
4 to Ms. -- Mr. Kataev's letter to me?

5 THE COURT: Yes. I agree with this.

6 Can we move along? If you want to ask her is she  
7 aware that she had to comply, which I think you already did.  
8 Ask that question but do not show her all of the things that  
9 her lawyer sent you. This is not a good use of your limited  
10 time.

11 Q You never provided the sworn statement requested here,  
12 correct?

13 A I don't know. Did I?

14 THE COURT: The question is: Were you aware that  
15 you were required to provide a sworn statement regarding  
16 compliance with the Court's order -- preliminary injunction  
17 order?

18 THE WITNESS: I'm not sure.

19 MR. WARNER: Object to form, Your Honor.

20 There's no evidence that she was, quote, required to  
21 provide it.

22 THE COURT: You can object to it.

23 The question is: Were you ever made aware of that?

24 And you can come back and ask her whatever question  
25 you want.



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1           At any point, were you aware that you were supposed  
2 to give some kind of sworn statement?

3           THE WITNESS: Your Honor, I -- I feel like my  
4 attorney would have -- he's very reliable. I think he would  
5 have made sure I would have done it if it was something that I  
6 had to do.

7           THE COURT: The answer then is: You were never made  
8 aware --

9           THE WITNESS: I don't -- I don't believe so.

10          THE COURT: Okay.

11          Let's move on.

12 BY MR. KATAEV:

13 Q       Have you -- when did IME Companions close?

14 A       I'm not a hundred percent sure, Mr. Kataev. I know it  
15 was sometime last year, on or about, I want to say -- I want  
16 to say April of 2023.

17 Q       Okay.

18                 Since then have you renamed or rebranded  
19 IME Companions?

20 A       I have started a company in Texas called The IME Company,  
21 yes. It's not a rebrand. It is a brand new company.

22 Q       Have you opened any other companies in the IME observer  
23 industry?

24 A       No, I have not.

25 Q       And The IME Company is currently your full-time job,



1 correct?

2 A No. I'm trying to make it a full-time job. However, the  
3 harassment, the depression that I have been in and the  
4 heightened anxiety from the harassment is making it very  
5 difficult for me to make it a full-time job.

6 MR. KATAEV: Move to strike as nonresponsive.

7 THE COURT: Let's move on. I am not striking.

8 Q You sold the website of IME Companions to Eugene Liddie  
9 correct?

10 A Yes.

11 Q Other than that, you did not sell anything else to  
12 Liddie, correct?

13 A No, I did not.

14 MR. KATAEV: I'd like to mark what is -- I'd like to  
15 present what's been marked for identification as Plaintiff's  
16 Exhibit 49.

17 (Exhibit published.)

18 THE COURT: All right.

19 I will note for the record that ordinarily we would  
20 just show it to the witness before you would -- or so you  
21 could establish a basis for admission, but in order to  
22 expedite things I am going to look at all the exhibits you are  
23 putting before her, but many of them I am not going to admit  
24 as we have just discussed unless there is a legitimate basis  
25 to admit them.



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1 All right. Go ahead.

2 You can look at this exhibit, Ms. Gelardi.

3 BY MR. KATAEV:

4 Q I'll represent to you that this is a printout of The IME  
5 Company's Facebook page.

6 Does that look familiar to you?

7 A No, it doesn't, but I'm sure it's on my Facebook page.  
8 I -- I don't even go on my Facebook.

9 Q The phone number for The IME Company is (833) 229-1244,  
10 correct?

11 A I own two phone numbers and I used them both for The IME  
12 Company.

13 Q Is this one of them?

14 A Yes.

15 Q And this is a number that was previously used at  
16 IME Companions to serve your primary customer, Subin &  
17 Associates, correct?

18 A That is correct.

19 Q The IME Company posted its branding on Facebook in  
20 April 2024 for the first time, correct?

21 A In April of 2024?

22 Q Yes.

23 A I'm sorry. Can you repeat that question?

24 Q The first time you presented The IME Company on Facebook  
25 was this past April, correct?



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1 A I believe so.

2 Q Does this refresh your recollection?

3 A Yes.

4 MR. KATAEV: I'm going to the page in this  
5 exhibit marked 89 of 174.

6 (Exhibit published.)

7 Q This is a picture of Subin & Associates, correct?

8 A Yes.

9 Q And this is a post from August 2nd, 2022, correct?

10 A I don't know. I did not post this.

11 Q When you created the Facebook page for The IME Company,  
12 you simply renamed it from what you previously had for  
13 IME Companions, correct?

14 A No, you're mistaken.

15 THE WITNESS: I created a whole new company with the  
16 original vision that I had for IME Companions. So when I  
17 built the new -- when I built The IME Company website, to make  
18 it economical for me, instead of building a whole new website  
19 from scratch, Your Honor, I told them, is there any way you  
20 can revive my old website from the Wayback Machine, just to  
21 save me time because I'm mentally unstable. I don't want to  
22 go through the what we do, what kind of business we are, who  
23 do we represent. I didn't have the energy to do that.

24 So I asked the new marketing company, is there any  
25 way you can pull up my old company? It's on the Wayback



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1 Machine, and just give me my company website, just build  
2 my look back to me and name it The IME Company. They found  
3 it, they said yeah, sure. And that's what we did.

4 THE COURT: Can you clarify something for me,  
5 Mr. Kataev?

6 I thought a moment ago this witness testified that  
7 The IME Company was launched in April of 2024, but this has a  
8 date of August 2022.

9 MR. KATAEV: I will clarify that with some further  
10 questioning.

11 THE COURT: Okay.

12 THE WITNESS: Your Honor, I did not post this. I --  
13 I would never use --

14 THE COURT: Hold on. There is no question pending.  
15 Ask your question, Mr. Kataev.

16 BY MR. KATAEV:

17 Q When you sold your website to Mr. Liddie, you did not  
18 sell him the Facebook page, correct?

19 A No, I did not.

20 Q You kept the Facebook page for yourself, correct?

21 A It's attached to my personal profile. You can't -- I'm  
22 not even sure if you can sell a Facebook page.

23 Q IN this same profile for The IME Company, all of your  
24 existing prior posts with IME Companions are still there,  
25 correct?



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16

1 A Correct.

2 Q Okay.

3 MR. KATAEV: Your Honor, I'd like to offer  
4 Exhibit 49 into evidence.

5 THE COURT: I am sorry. I am a little lost here.  
6 This is a Facebook page?

7 MR. KATAEV: These are excerpts of the main page of  
8 The IME Company.

9 THE COURT: Okay.

10 MR. KATAEV: And instead of going through each one,  
11 I'd just like to offer it into evidence.

12 THE COURT: My concern is that I do not think this  
13 witness has testified to that fact.

14 Do you recognize --

15 THE WITNESS: No, Your Honor.

16 THE COURT: -- this exhibit?

17 THE WITNESS: I never posted it.

18 THE COURT: But can you take a look at Exhibit 49,  
19 is it?

20 THE WITNESS: Yeah, so basically --

21 THE COURT: No, no, no. I am asking you to look at  
22 it in paper copy.

23 THE WITNESS: Here?

24 THE COURT: Yes.

25 How many pages is it?



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1 MR. KATAEV: It's a lot of pages. It's in Binder 2,  
2 Exhibit 49.

3 MR. WARNER: Your Honor, this is not on the  
4 exhibit list.

5 THE COURT: All right.

6 Well, listen, I am not going to get hung up on a  
7 formality. I just want to establish --

8 THE WITNESS: I just want to understand what they're  
9 asking me, because this is Subin's -- this is Subin's site,  
10 not mine.

11 THE COURT: I am going to ask you not to ask  
12 questions. I want you to look at the book.

13 THE WITNESS: I'm looking at it.

14 THE COURT: Exhibit 49 and page through it.

15 THE WITNESS: Okay.

16 THE COURT: And tell me if you recognize those  
17 pages.

18 THE WITNESS: Facebook -- these are -- these are.

19 THE COURT: The question is: Have you ever seen  
20 these pages before? Do you know what they are, that are in  
21 Exhibit 49?

22 And for the record, they number probably about 50  
23 plus pages.

24 THE WITNESS: No, Your Honor. It looks like these  
25 are all my previous marketing, except for the one with Subin.



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1 I don't know what that is.

2 MR. KATAEV: Looking at the ELMO on the screen --

3 THE WITNESS: These are all my social media  
4 marketing, Your Honor --

5 THE COURT: Okay.

6 THE WITNESS: -- that my previous company did for  
7 me, but never once have they used a Subin post.

8 THE COURT: Okay.

9 THE WITNESS: Or Subin picture.

10 THE COURT: Let's back up for a minute.

11 On these pages are references or logos for both IME  
12 Company and also some images relating to --

13 THE WITNESS: IME Companions.

14 THE COURT: Correct.

15 THE WITNESS: That is correct.

16 THE COURT: So can someone explain to me. IME  
17 Company is your company that you created in Texas; is that  
18 right?

19 THE WITNESS: Correct, yes.

20 THE COURT: Okay.

21 And when did you create that company?

22 THE WITNESS: In April of 2024.

23 THE COURT: Okay.

24 So then explain to me why some of these posts from  
25 The IME Company are dated -- I think we were looking at one



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1 dated for August 2022. I am looking at one now, it does not  
2 have page numbers, for October 2021.

3 The question is: Why are there IME Company  
4 purported postings that predate April 2024?

5 THE WITNESS: So Your Honor, I have absolutely no  
6 clue. However --

7 THE COURT: Hang on.

8 What do you mean you have no clue? It is your  
9 company. Is it not IME Company?

10 THE WITNESS: Yes.

11 THE COURT: Okay.

12 So is this your logo on all these pages?

13 THE WITNESS: Yes. Yes.

14 THE COURT: Okay.

15 And are these postings that you or someone in your  
16 company, IME Company, made pre-April 2024?

17 THE WITNESS: No, Your Honor.

18 The -- this is -- this is the only explanation I  
19 could come up with. This is -- and this is the first time  
20 I'm -- this is brought to my attention.

21 The only thing that I could come up with is once you  
22 change the name on the Facebook from IME Companions to The IME  
23 Company, I -- and again, I'm just making an assumption, maybe  
24 it just changes on every single previous post because now the  
25 name changed.



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1 Now, if you go back -- but, Your Honor, I do want  
2 to --

3 THE COURT: But let me clarify because I --

4 THE WITNESS: I am not --

5 THE COURT: Hang on. Please stop talking.

6 Sorry.

7 Is it your answer that when you asked the website  
8 company or whoever was helping you start IME Company to use  
9 your IME Companion's website material, that somehow it then  
10 attached the new company name to some pre-April 2024 postings  
11 that were done for IME Companions?

12 Is that what you think happened?

13 THE WITNESS: I think so, Your Honor. And I also  
14 think that --

15 THE COURT: Let me ask you another question.

16 Is this the first time you are seeing --

17 THE WITNESS: First time.

18 THE COURT: -- these documents?

19 THE WITNESS: Correct.

20 THE COURT: In this form?

21 THE WITNESS: Yes.

22 THE COURT: Okay.

23 But are these the prior IME Companions's website  
24 postings?

25 THE WITNESS: Correct.



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1 THE COURT: Okay.

2 Go ahead, Mr. Kataev.

3 MR. WARNER: Your Honor, may I be heard at least on  
4 this?

5 THE COURT: No, have a seat.

6 Let's go on.

7 BY MR. KATAEV:

8 Q Based on this, you have continued to work in the IME  
9 observer industry in New York since closing Companions,  
10 correct?

11 A So we never really closed, is what you don't understand.  
12 We went -- we were out of business because we lost all our  
13 clients. We never really shut the business down. It's still  
14 an active business.

15 THE COURT: The question is: Did you service  
16 clients in New York?

17 THE WITNESS: One off here and there.

18 THE COURT: All right.

19 Why don't you establish some date range, Mr. Kataev.

20 Q When was the last time you scheduled an IME since  
21 shutting making Companions inactive?

22 A An IME for The IME Company? Or IME Companions?

23 Q Any company since -- in New York.

24 A So for The IME Company, I've only had one IME, one, and  
25 that was a company, a law firm that actually called and



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1 reached out to The IME Company, and I assumed, I totally  
2 assumed, and I still believe so, that they might have reached  
3 out to us through -- because of the advertisements.

4 THE COURT: I apologize for interrupting you so  
5 much, Mr. Kataev, but I want to make sure I get what  
6 information I need.

7 IME Company was created in Texas where you live now,  
8 right?

9 THE WITNESS: Correct.

10 THE COURT: But you service clients in New York or  
11 in other states outside of Texas?

12 THE WITNESS: I'm -- I'm willing to service any  
13 client around the country, Your Honor.

14 THE COURT: Okay.

15 And have you or has your company, IME Company,  
16 serviced clients in New York since its creation in  
17 April 2024 --

18 THE WITNESS: Just one, correct.

19 THE COURT: Okay. Just one.

20 THE WITNESS: I've only had one client so far for  
21 the company.

22 THE COURT: And who is that client?

23 THE WITNESS: It is a client Slater & Slater -- I  
24 don't even -- I don't even remember the name of the firm.

25 THE COURT: Okay.



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23

1 Slater & Slater.

2 Move on.

3 MR. KATAEV: Okay.

4 BY MR. KATAEV:

5 Q Have you marketed to any law firms in New York since  
6 making Companions inactive?

7 A Mr. Kataev, I don't know if you can market to an area.  
8 I'm not very versed in that. I just -- I -- I just approve --  
9 I just approve the marketing and it goes where it goes. I  
10 don't know where it goes.

11 Q Have you had any meeting regarding marketing in the IME  
12 observer business in New York since making Companions  
13 inactive?

14 A I'm sorry. Repeat that question.

15 Q Have you had any meetings concerning marketing in the IME  
16 observer business in New York?

17 A No, I have not.

18 Q Have you invoiced any law firm customers since March 27,  
19 2023, after the Court issued its expanded preliminary  
20 injunction?

21 A I might have invoiced for -- I'm owed a lot of money. I  
22 might have -- yeah, I'm sure that I asked for my money.

23 Q When was the last time you invoiced any law firm for any  
24 IME in New York?

25 A I'm not sure of that. I haven't invoiced in a very, very



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1 long time. I don't know.

2 Q Have you spoken to any IME observers since March 27,  
3 2023, for any IME in New York?

4 A From New York? Since when?

5 Q March 27, 2023?

6 A I'm not sure. I don't believe so.

7 MR. KATAEV: I'd like to present what's been marked  
8 for identification as Plaintiff's Exhibit 2.

9 THE WITNESS: Your Honor --

10 THE COURT: No. No. Just answer the questions.

11 (Exhibit published.)

12 Q On March 14th, 2023, Sara Gonzalez of Client Exam  
13 Services observed an IME for the customer Ginarte; correct?

14 MR. WARNER: Objection to form, Your Honor. This is  
15 hearsay and should not be admitted and nor should he  
16 be permitted to ask questions in the manner that he did.

17 MR. KATAEV: I didn't offer into evidence.

18 THE COURT: Well, there has been no question asked.

19 MR. WARNER: Objection --

20 THE COURT: Hang on, hang on, folks.

21 This is not a document authored by this individual;  
22 is that correct?

23 MR. KATAEV: It's not authored by the individual.

24 THE COURT: And are you offering it for the truth  
25 that there was such an examination on that date?



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1 MR. KATAEV: I'm asking her the question first and  
2 if she says she doesn't know --

3 THE COURT: Why don't you ask the question before  
4 putting up the indictment.

5 Were you aware of an examination, and then fill in  
6 the rest, Mr. Kataev.

7 BY MR. KATAEV:

8 Q Are you aware that on March 14th, 2023, Sara Gonzalez of  
9 Client Exam Services observed an IME for the customer Ginarte?

10 MR. WARNER: Objection to form, Your Honor.

11 THE COURT: Overruled.

12 Are you aware?

13 THE WITNESS: Who -- am I... I'm sorry. You have to  
14 repeat the question.

15 THE COURT: Yes.

16 A little slower: And so IME what was the group you  
17 said this time?

18 Q On March 14th, 2023, are you aware that Sara Gonzalez, an  
19 IME observer, observed an IME for Ginarte while working at  
20 Client Exam Services?

21 A No. I don't believe so. I don't recall, but also, I was  
22 not managing Client Exam Services.

23 THE COURT: Could we go back?

24 Do you know Sara Gonzalez.

25 THE WITNESS: I do know Sara.



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1 THE COURT: Who is Sara?

2 THE WITNESS: Sara Gonzalez was a previous  
3 companion, Your Honor.

4 THE COURT: Meaning she previously worked for you at  
5 IME Companions?

6 THE WITNESS: Correct.

7 THE COURT: Okay.

8 Go ahead. Client Exams, do you know what that is?

9 THE WITNESS: Yes.

10 THE COURT: And what is that?

11 THE WITNESS: Client Exams Services is when we were  
12 ordered to shut down for those two weeks, Your Honor --

13 THE COURT: Right.

14 MR. WARNER: -- that's when we signed over the  
15 business to Fari Gutierrez where he started Client Exam  
16 Services. And he took over the calendar and what was  
17 scheduled in the calendar.

18 THE COURT: Okay.

19 And that company was the subject of a prior contempt  
20 proceeding, correct?

21 THE WITNESS: I don't know. Was it?

22 THE COURT: All right.

23 Move on.

24 BY MR. KATAEV:

25 Q In other words, Client Exam Services was formed in order



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1 to continue servicing --

2 A No.

3 THE COURT: Hang on. Let him finish the question.

4 Q In order to continue servicing customers that Companions  
5 had, correct?

6 A No, Mr. Kataev -- oh, wait. No, Mr. Kataev.

7 Client Exams Services was a company that was  
8 established by someone else who had intentions of buying a  
9 franchise.

10 THE WITNESS: Yes, they took over the calendar,  
11 Your Honor. We --

12 THE COURT: No, let's go on.

13 Q Ginarte was a customer of Companions, correct?

14 A Yes, correct.

15 Q And you obtained that customer, Ginarte, by bribing Adam  
16 Rosenblatt of IME Watchdog, correct?

17 A No. Absolutely not.

18 MR. KATAEV: I'd like to present what's been marked  
19 for identification as Plaintiff's Exhibit 34.

20 (Exhibit published.)

21 Q I'll represent to you that these are text messages  
22 between you and Mr. Rosenblatt from the forensic examination.

23 Do you recognize this exhibit?

24 MR. WARNER: Your Honor, again, I object.

25 This exhibit was not part of the exhibit list. What



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1 would the purpose of having an exhibit list if you now bring  
2 in, at this hearing, things that he never indicated he was  
3 using as an exhibit?

4 MR. KATAEV: For impeachment purposes, Your Honor.

5 THE COURT: All right.

6 MR. KATAEV: Bribing him and this text message  
7 shows.

8 THE COURT: Overruled.

9 Let me just make sure these materials were provided  
10 to the defense?

11 MR. KATAEV: Yes.

12 THE COURT: Because they were part of the forensic  
13 exam, right?

14 MR. KATAEV: Yes.

15 THE COURT: Okay. Go ahead.

16 BY MR. KATAEV:

17 Q These text messages were obtained through the forensic  
18 examination, correct?

19 A I'm sorry. What's your question?

20 THE COURT: Do you think she knows the answer to  
21 that question?

22 THE WITNESS: What's the question?

23 THE COURT: Hang on. Hang on. Hang on.

24 Let's move on.

25 Q In this text message exchange you ask Adam for a law firm



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1 customer and he provides you Ginarte, correct?

2 A So --

3 THE COURT: Mr. Kataev, perhaps you can orient all  
4 of us.

5 You are showing about four different parts of a  
6 conversation. Why don't you identify who the phone number is  
7 which says Liar Snake, from Liar Snake? Who is that?

8 MR. KATAEV: Okay.

9 THE COURT: I do not want you to testify, but does  
10 she know?

11 MR. KATAEV: Okay.

12 Q The phone number that says: Mama (718) 749-4732, that's  
13 your phone number, correct?

14 A Yes, that is.

15 Q And the phone number next to Liar Snake of (347) 665-2160  
16 is Adam Rosenblatt, correct?

17 A Liar Snake was IME -- um, what's his -- Adam Rosenblatt,  
18 yes.

19 MR. KATAEV: Okay.

20 THE COURT: Did you give the name Liar Snake to that  
21 number in your phone book?

22 THE WITNESS: Yes.

23 THE COURT: Okay. Let's move on.

24 Q And in these messages from December of 2019, Adam  
25 provides you with the name and contact information of the



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1 person who schedules IMEs at Ginarte, correct?

2 THE COURT: For the court reporter, Ginarte is  
3 spelled G-I-N-A-R-T-E.

4 Q Is that correct?

5 A Ask your question again, please?

6 Q In this text message exchange, Adam Rosenblatt provides  
7 you with the phone number of the individual who schedules IMEs  
8 at Ginarte, correct?

9 A Okay. So I'm very happy you actually brought this up.

10 Q I just need a yes or no. Your attorney will ask you  
11 those questions.

12 THE WITNESS: Your Honor, may I?

13 THE COURT: The question is: Did he give you the  
14 phone numbers for who schedules IMEs at Ginarte; yes or no?

15 THE WITNESS: It looks like he did, yes.

16 But may I please answer this question?

17 THE COURT: No, no. Your lawyer will ask you a  
18 follow-up question.

19 Go ahead.

20 Q And you paid Adam Rosenblatt --

21 A No, I did not.

22 MR. KATAEV: I'd like to present what's been marked  
23 for identification as Plaintiff's Exhibit 82.

24 (Exhibit published.)

25 THE COURT: Did you want to admit the last exhibit?



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1 What was the number?

2 MR. KATAEV: Yes, Your Honor.

3 I offer into evidence Plaintiff's Exhibit 34.

4 THE COURT: All right.

5 Now this is a bit of an issue because you did not  
6 identify it as an exhibit, but nonetheless, I think it is  
7 worth having that document in evidence, so I am going to admit  
8 that one.

9 (Plaintiff's Exhibit 82 received in evidence.)

10 MR. WARNER: Your Honor, may I simply respond to the  
11 claim?

12 THE COURT: No, you get to redirect. So let's go  
13 on.

14 MR. KATAEV: Okay.

15 Q Plaintiff's Exhibit 82 is a collection of emails that  
16 Adam received from Zelle for payments that you made to him by  
17 Zelle, correct?

18 A Yes.

19 Q Okay.

20 And on page 3 of this exhibit, on November 11, 2019,  
21 IME Companions Zelled Adam \$100, correct?

22 A Yes.

23 Q And that payment was made directly in exchange for  
24 providing Ginarte as a customer, correct?

25 A No. I -- I believe the exhibit you showed me was in



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1 two --

2 THE WITNESS: I don't know, Your Honor.

3 THE COURT: You are right.

4 Mr. --

5 THE WITNESS: It was in 2022, I think.

6 THE COURT: No, no.

7 Mr. Kataev, I think the text chain or whatever it  
8 was, was 2019, December, I believe. You are showing her now  
9 payments that are pre- --

10 THE WITNESS: That I made for using WatchDog.

11 THE COURT: Please, Ms. Gelardi.

12 You need to sort of establish the date and time  
13 range, because you are just throwing down some documents, but  
14 the prior exhibit, which was number 34.

15 MR. KATAEV: 34.

16 THE COURT: I believe was dated in December 2019.

17 Do you want to put that back up there?

18 MR. KATAEV: That's correct, Your Honor. It's  
19 December of '19.

20 THE COURT: Okay.

21 So these Gmails, or I guess that you are putting now  
22 in front of her as exhibit --

23 MR. KATAEV: 82.

24 THE COURT: 82?

25 These are dated between, I think the first one was



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1 pre-December 2019. You just need to be a little more careful  
2 with the record because none of this is being recorded.

3 So you are starting with a page that is dated  
4 August 1, 2019.

5 Next is October 8, 2019.

6 November 11, 2019. Okay?

7 And then it jumps to March 5, 2020. Okay.

8 So what is the question posed to Ms. Gelardi?

9 And you should look at these pages, Ms. Gelardi.

10 THE WITNESS: I will, Your Honor.

11 BY MR. KATAEV:

12 Q During the period of 2019 and 2020, you regularly sent  
13 money by Zelle to Mr. Rosenblatt, correct?

14 A I did use the watchdogs and I paid him for -- for the  
15 Watchdogs.

16 Q Okay.

17 But you also paid Mr. Rosenblatt for providing you  
18 with customers, correct?

19 A No, I did not.

20 THE COURT: I am sorry.

21 What do you mean by paid him for the watchdogs?

22 THE WITNESS: Your Honor, I used his watchdogs when  
23 I didn't -- when I -- when I didn't have enough coverage in  
24 my -- with my own reps.

25 THE COURT: Okay.



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1           So Mr. Kataev, her answer is not so much that she  
2 was paying him to give her customers, but rather she was  
3 paying him to provide watchdogs or companions or watchdogs.

4           So I don't know if you want to follow up on that.

5           And I will say this to everybody. It has been  
6 established already, we had one lengthy contempt hearing at  
7 the beginning, and I will warn you, Ms. Gelardi, previously I  
8 did find that you paid Mr. --

9           What was his name again?

10          MR. KATAEV: Rosenblatt.

11          THE COURT: -- Rosenblatt for customers, a customer  
12 list, et cetera, from IME Watchdog. That is already  
13 established in my mind. I do not want to retread this.

14          But I am not sure, Mr. Kataev, why you are going  
15 back over this again. And she is giving you an answer that is  
16 not consistent with what I previously found in your theory, I  
17 think. But go ahead.

18          MR. KATAEV: I will move on, Your Honor.

19          THE COURT: All right. Go ahead.

20          MR. KATAEV: We will deal with it in supplemental  
21 briefing based on what we had on an evidentiary hearing.

22          THE COURT: Perhaps.

23          MR. WARNER: Your Honor --

24          THE COURT: Folks, I am not saying there is going to  
25 be supplemental briefing. This is a topic I want to take up



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1 with you at the end of this.

2 Go ahead.

3 MR. WARNER: I object to the introduction of the  
4 document, Your Honor. This 82, as well as 34.

5 It has nothing to do with the issues at this  
6 hearing.

7 THE COURT: Well, I am going to admit them. I am  
8 not sure if they have any relevance right now, but for now, I  
9 am going to admit everything.

10 Go ahead.

11 I mean, those two documents. So right now I have  
12 Exhibit 49, 34 and 82 is admitted. Actually not 49, I am  
13 sorry.

14 49, this witness had never seen before, so I am not  
15 admitting 49.

16 MR. KATAEV: Correct. Okay.

17 BY MR. KATAEV:

18 Q You were paid for the IME that we looked at from  
19 March 14th, 2023, correct, that Sara Gonzalez observed?

20 A I'm not sure. It was over a year ago.

21 Again, with harassment, with cars following us  
22 around, with me -- with you guys signing me up to an enormous  
23 amount of porn websites, to you signing me up to dating  
24 websites, for you -- I -- I can't keep anything in my mind  
25 stable.



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1 THE COURT: Ms. Gelardi, it would be helpful if you  
2 just focused on the question.

3 THE WITNESS: You don't know.

4 THE COURT: These answers are not helpful.

5 THE WITNESS: You have destroyed my mental state.

6 I don't know, Your Honor.

7 THE COURT: All right. So the answer is you do not  
8 know.

9 Hold on one second, we need to fix the realtime.

10 (Pause in the proceedings.)

11 (Discussion held off the record.)

12 THE COURT: All right.

13 Why don't we just continue and we will try to fix it  
14 during a break.

15 MR. KATAEV: We have some people that walked into  
16 the courtroom. I just want to determine if any of them are  
17 witnesses.

18 THE COURT: Yes. I think they look like courthouse  
19 interns or staff or something like that.

20 I saw them earlier and I just made that assessment,  
21 not to profile you folks, but you look like nice interns.

22 Let's go on. Now it is working. Let's go.

23 Did you bring any water for your client? We will  
24 get some water.

25 Let's go.



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1 MR. KATAEV: Okay.

2 BY MR. KATAEV:

3 Q When was the last time you spoke to Sara Gonzalez?

4 A I haven't spoke to Sara for over a year, until, I would  
5 say -- I don't remember when. She called me, it was 6:00 in  
6 the morning.

7 Very recently, Your Honor. But again, I don't know  
8 if what's going on is controlling my memory loss, I have not  
9 gone to doctors or anything.

10 However, Your Honor, she called me. She -- she --  
11 she said what's going on? She -- she found a subpoena taped  
12 to her door.

13 I said Sara, I'm sorry. I don't know. And that was  
14 the extent of our conversation --

15 THE COURT: Next question.

16 Q She doesn't work for The IME Company, does she?

17 A No, she doesn't.

18 Q Do you know who she works for?

19 A I absolutely do not.

20 Q When was the last time Sara Gonzalez attended an IME for  
21 you?

22 THE WITNESS: Well over a year ago, Your Honor.

23 Q Okay.

24 When -- when Sara Gonzalez began working at Client  
25 Exam Services, you told her that everything would be the same



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1 as before with Companions, correct?

2 A I don't know if I -- I would not -- I don't recall ever  
3 saying something like that.

4 Q Were you present at the hearing when Jeff Beiben  
5 testified on March 27, 2023?

6 A Mr. Kataev, yes, I was present. If you're going to ask  
7 me if I remember, again, the amount of anxiety this case has  
8 brought to me, I can't remember what I ate --

9 MR. KATAEV: Move to strike.

10 A -- this morning.

11 THE COURT: No, let's move on.

12 But again, Mrs. Gelardi --

13 THE WITNESS: I'm sorry.

14 THE COURT: -- much better if you just focus on the  
15 question.

16 Let's go.

17 MR. KATAEV: Okay.

18 Q Mr. Beiben testified at that hearing?

19 MR. WARNER: Objection, Your Honor as to what  
20 Mr. Beiben testified to. This is --

21 THE COURT: Well, no, you should not be asking her  
22 about -- you should not be representing the testimony.

23 And I think we ought to move on off of this topic.  
24 This was the subject of the prior contempt proceeding.

25 So let's move on to the current allegations.



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1 MR. KATAEV: Okay.

2 Q On March 15th, 2023, Tiffany Uribe, U-R-I-B-E, of Client  
3 Exam Services observed an IME for Subin & Associates, correct?

4 A Mr. Kataev --

5 THE WITNESS: Okay. Your Honor, I don't know what  
6 happened last week.

7 THE COURT: Okay.

8 So your answer is you do not remember.

9 Let's go.

10 Q It would be helpful if you said yes, no, or I don't know.

11 A I don't know.

12 If you ask me everything -- anything to do with  
13 current or present, I may be able to give you an answer.

14 THE COURT: Go ahead, Mr. Kataev. Next question.

15 Q Tiffany Uribe used to be a companion, correct?

16 A Yes.

17 Q You directed Tiffany Uribe to attend this IME for Subin,  
18 correct?

19 A When was it?

20 Q March 15th, 2023.

21 A I don't recall, but I might have. I do not recall.

22 Q Subin was a client of IME Companions, correct?

23 A Yes.

24 Q Subin was the biggest client that was stolen by

25 Companions from --



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1 A Subin was never stolen. Subin left because your client  
2 was stealing their clients.

3 THE COURT: Was Subin on the list of customers you  
4 were not allowed to do business with?

5 THE WITNESS: After you ordered me, ma'am?

6 THE COURT: Yes.

7 THE WITNESS: Yes.

8 THE COURT: All right. Go on.

9 Q This IME on March 15th, 2023, was observed five days  
10 after the temporary restraining order shutting Companions  
11 down, correct?

12 MR. WARNER: Objection, Your Honor. He's  
13 testifying.

14 THE COURT: Overruled.

15 Do you know the answer to that question?

16 Ask it again.

17 Q This IME was observed five days after this Court shut  
18 down Companions in a temporary restraining order, correct?

19 THE COURT: Do you know the answer to that; yes or  
20 no?

21 THE WITNESS: I'm going to answer to the best of my  
22 ability, Your Honor.

23 A lot of these exams were scheduled in advance, so  
24 it might have been scheduled in advance and it -- it -- and  
25 they represented the client because it was already in their



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1 calendar, but I don't believe that I assigned it the day  
2 before or anything after March 10th, because I fell into a  
3 deep depression, Your Honor.

4 THE COURT: All right.

5 Next question, Mr. Kataev.

6 Q On March 27, 2023, Sara Gonzalez observes an IME for  
7 Ginarte, correct?

8 A I don't know, Mr. Kataev.

9 MR. KATAEV: I'd like to present what's been marked  
10 for identification as Plaintiff's Exhibit 4.

11 (Exhibit published.)

12 Q I will represent to you, Ms. Gelardi, that this is a  
13 publicly-available document, and I want to focus your  
14 attention on the date over here. It says March 27th.

15 Do you see that?

16 A Yes.

17 MR. WARNER: Your Honor, objection. This document  
18 is not in evidence and it is no way for Mr. Kataev to put it  
19 into evidence and the witness has already said that she  
20 doesn't know.

21 THE COURT: All right.

22 Overruled.

23 I assume this is going to be some form of  
24 impeachment, but let's see where this goes.

25 Mr. Kataev.



1 Q And on the bottom left it says: Gonzalez Winograd,  
2 that's another name for Ginarte, correct?

3 A Yes, I believe so.

4 Q And on page 3 of this same exhibit, there's an IME report  
5 by a doctor to the defense firm, correct?

6 A Yes, on -- I -- I -- I recognize the doctor's name.

7 Q And it says in the first paragraph that there was an exam  
8 conducted on March 27th and Sara Gonzalez was there from  
9 Joseph A. Ginarte, correct?

10 A You do understand that Sara was an independent  
11 contractor, right?

12 THE COURT: Overruled. Sorry not overruled.

13 Unresponsive.

14 Ask your next question.

15 The question is: Were you aware that there was this  
16 IME on March 27, 2023, by Sara Gonzalez?

17 THE WITNESS: No, I'm not aware. And it says that  
18 she's an interpreter for Ginarte. It doesn't say she was a  
19 companion or a rep, or any kind of observer.

20 Q You deny directing Ms. Gonzalez to go to this IME?

21 A I'm telling you I don't recall, but this here states that  
22 she went in as an interpreter.

23 Q Were you paid to have Ms. Gonzalez attend this as an  
24 interpreter?

25 A I don't know if you understand what I don't remember



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1 means, Mr. Kataev.

2 Q I need you to answer I don't remember.

3 A I don't remember.

4 Q Thank you.

5 THE COURT: I think you want to ask the question,  
6 though: Did your company, your prior company --

7 THE WITNESS: No.

8 THE COURT: Hold on.

9 -- IME Companions, get paid for Sara Gonzalez's  
10 attendance at that IME on --

11 THE WITNESS: Not to my knowledge, Your Honor. I  
12 don't remember.

13 THE COURT: Okay.

14 Go ahead.

15 Q On March 31st --

16 MR. KATAEV: And just for the record, March 27th,  
17 2023, the day this exam was conducted, is the same day as the  
18 hearing we had last year, correct?

19 THE WITNESS: I don't even remember that,  
20 Your Honor.

21 Q Okay.

22 On March 31st, 2023, Christian Hogarth of Client  
23 Exam Services observed an IME for Zemsky & Salomon, correct?

24 A I -- I'm going to take your word for it.

25 THE COURT: Meaning you do not know?



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1 THE WITNESS: Yes.

2 THE COURT: Okay.

3 Go ahead.

4 Q Christian Hogarth was previously a companion at  
5 IME Companions, correct?

6 A Yes.

7 Q When was the last time you spoke to Christian Hogarth?

8 A Well over a year ago.

9 Q When is the last time that Christian Hogarth observed an  
10 IME for you?

11 A I'm going to say over a year ago, also.

12 Q Zemsky & Salomon was a client of IME Companions, correct?

13 A Correct.

14 Q And Zemsky & Salomon is on the joint customer list, also,  
15 correct?

16 A Yes.

17 Q On April 5th, 2023, Tiffany Uribe of Client Exam Services  
18 also observed an IME for Zemsky & Salomon, correct?

19 A I'm going to take your word for it, also, Mr. Kataev.

20 MR. WARNER: Your Honor, I object to this whole line  
21 of questioning. The witness has said she does not recall --

22 THE COURT: Overruled. I need to hear her say that,  
23 though.

24 All right. Go ahead.

25 Q I need to know whether the answer is yes, no or I don't



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1 remember.

2 A I don't even remember your question, Mr. Kataev.

3 Q On April 5th, 2023, Tiffany Uribe of Client Exam Services  
4 also observed an IME for Zemsky & Salomon, correct?

5 A I don't remember.

6 Q On April 12th, 2023, Lizbeth Medina observed an IME for  
7 Ginarte, correct?

8 A I don't know, Mr. Kataev.

9 Q Lizbeth Medina previously worked as a companion at  
10 IME Companions, correct?

11 A Yes.

12 Q Lizbeth Medina was doing -- was observing IMEs at your  
13 direction in April of 2023, correct?

14 THE WITNESS: Your Honor, there's no way for me to  
15 answer any questions in regards to April of 2023.

16 THE COURT: Again, just simply say you do not  
17 remember if you do not remember.

18 THE WITNESS: I don't remember.

19 THE COURT: All right.

20 Go ahead.

21 Q When was the last time you spoke to Lizbeth Medina?

22 A Well over a year ago.

23 Q When was the last time Lizbeth Medina observed an IME for  
24 you?

25 THE WITNESS: Well over a year ago, Your Honor.



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1 It's been so long. I've been in a hole of depression. I  
2 don't do anything.

3 THE COURT: Let's move on.

4 Q On April 14th, 2023, Jeff Beiben accompanied Lara Burns,  
5 the plaintiff in a personal injury case, where she was  
6 represented by Bergman & Bergman, correct?

7 A What was the date again?

8 Q April 14th, 2023.

9 A I don't recall.

10 Q Jeff Beiben is your brother-in-law, correct?

11 A Yes.

12 Q And Jeff Beiben also worked at IME Companions, correct?

13 A Yes.

14 Q When was the last time you spoke to Mr. Beiben about any  
15 IMEs in New York?

16 A I...

17 THE COURT: What was the answer?

18 When is the last time you talked to Mr. Beiben, your  
19 brother-in-law, about IMEs in New York?

20 THE WITNESS: I asked Jeff Beiben to cover the one  
21 IME that I received for The IME Company. That was it.

22 I had no conversations with Jeff Beiben in regard to  
23 any IMEs in New York, Your Honor.

24 THE COURT: And when was that IME that you had him  
25 cover?



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1 THE WITNESS: I want to say -- what are we in? May,  
2 right? I want to say the end of -- sometime end of April,  
3 beginning of May, of this year.

4 THE COURT: Okay.

5 Go ahead, Mr. Kataev. Followup.

6 Q That IME that Jeff Beiben did observe was in Buffalo,  
7 correct?

8 A Correct.

9 Q On April 19th, 2023, Fari Gutierrez, observed an IME for  
10 Ginarte, correct?

11 A I don't know.

12 THE COURT: Mr. Kataev, do you want to clarify the  
13 Buffalo IME, who the law firm was?

14 Q Do you know the name of the customer --

15 MR. KATAEV: Oh, she testified to it, Your Honor. I  
16 think it was Slater & Slater.

17 THE COURT: Oh, okay. My apologies, I think I  
18 missed that.

19 Go ahead.

20 MR. KATAEV: Presenting what's been previously  
21 marked for identification as Plaintiff's Exhibit 11.

22 (Exhibit published.)

23 Q I'll represent to you, Ms. Gelardi, that this document  
24 was received from a defense law firm in response to a subpoena  
25 we presented, and on the third page is the IME report.



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1 THE COURTROOM DEPUTY: I'm sorry. Please move the  
2 microphone to you.

3 Q On the third page is the IME report. It references here  
4 that there was an IME observed on April 19th, 2023, by  
5 F. Gutierrez.

6 Do you see that?

7 A I do see it.

8 Q Okay.

9 You directed Mr. Gutierrez to observe this IME,  
10 correct?

11 A I don't recall, Mr. Kataev. Maybe you can clarify it,  
12 maybe who the attorney was. Or give me more information?

13 Q So the plaintiff's name in this case is Rafael Antonio  
14 Cuaxil, right? Correct? C-U-A-X-I-L.

15 A Yes, it seems that.

16 Q And the summons on this page shows that the same  
17 plaintiff is represented by Ginarte, correct?

18 A Yes.

19 Q Did you direct Mr. Gutierrez to observe this IME on April  
20 19th?

21 A I don't recall. I think at this point he was  
22 representing his own business.

23 Q And that business is Client Exam Services?

24 A I believe so.

25 Q And Mr. Gutierrez is your family member, correct?



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1 A No, he's not my family member. He's a friend.

2 Q And this -- this April 19th IME occurred after the  
3 March 27, 2023, hearing, correct?

4 A April 19th does come after March 27th, Mr. Kataev.

5 Q And at that hearing, this Court ordered that Client Exam  
6 Services is enjoined from serving plaintiff's customers,  
7 correct?

8 THE WITNESS: Is that correct, Your Honor?

9 THE COURT: You should not ask me questions.

10 The question is: Were you aware that I had barred  
11 Client Exam Services from servicing IME Watchdog customers on  
12 that list?

13 THE WITNESS: For Client Exam Services?

14 THE COURT: Correct.

15 Were you aware?

16 THE WITNESS: I don't think I was.

17 THE COURT: All right.

18 Move on.

19 THE WITNESS: I don't --

20 THE COURT: No, no. You answered the question.

21 Let's go.

22 Q On April 19, 2023, the same date, Marc Purificati  
23 observed an IME for Subin, correct?

24 A What was that date?

25 Q April 19th, 2023.



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1 THE WITNESS: Your Honor, may I answer?

2 THE COURT: No. No questions of me.

3 Just can you answer the question?

4 THE WITNESS: I'm going to answer the question with  
5 they're presenting IMEs one after the other after the other,  
6 these clients both well in advance, if things were in the  
7 calendars of these people, I can't control whether they go or  
8 they don't, Your Honor.

9 THE COURT: All right.

10 I am not debating this with you, Ms. Gelardi, so the  
11 answer to the question is?

12 THE WITNESS: I don't remember the question.

13 Can you repeat it?

14 Q Did Marc Purificati observe an IME for Subin on  
15 April 19th, 2023?

16 A I don't recall if it was April 19th of 2023.

17 MR. KATAEV: We're presenting what's been marked as  
18 Plaintiff's Exhibit 12.

19 (Exhibit published.)

20 Q I will represent to you that this is a document that was  
21 given to us by -- I'm sorry.

22 I'll represent to you this is a publicly-filed  
23 document. I am going to refer to page 3.

24 On page 3 in the first paragraph is the date and  
25 then on third paragraph it says that the claimant was



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1 accompanied by Mark, IME Companion, correct?

2 A That's what it says.

3 Q So on this date, Marc Purificati continued observing IMEs  
4 for IME Companions, correct?

5 MR. WARNER: Objection, Your Honor.

6 This is a backhanded way of attempting to get  
7 inadmissible documents into evidence from a witness who said  
8 she doesn't know.

9 THE COURT: Overruled.

10 THE WITNESS: I want to answer --

11 THE COURT: No. I do not want you answering any --  
12 making any statements or answering any questions.

13 Both of you sit down. You sit down.

14 Mr. Kataev, let me tell you this: It would be much  
15 more helpful and a better use of your time if you simply asked  
16 her the questions about the IME, does she remember them? Did  
17 she have any involvement in sending someone? Did she get any  
18 money, et cetera?

19 The documents themselves, you do not need to show  
20 them to her. You can present them to me as admissible  
21 evidence on their own to prove that an IME happened. But  
22 asking her to look at the them and then comment on them is not  
23 a useful -- is not a good use of your time.

24 I am sustaining the objection only in that I do not  
25 want you to continue to show her documents when she says I



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1 don't remember if there was an IME.

2 You can establish that she does not remember all of  
3 the IMEs that you think are relevant. But let's move this  
4 along.

5 THE WITNESS: Your Honor --

6 THE COURT: No.

7 THE WITNESS: No?

8 THE COURT: Go ahead.

9 BY MR. KATAEV:

10 Q Marc Purificati was previously a companion at  
11 IME Companions, correct?

12 A Marc Purificati was a very well-known companion and a  
13 very well-liked companion.

14 THE COURT: The question was -- answer the question,  
15 please.

16 THE WITNESS: Yes, he was.

17 THE COURT: All right.

18 Next question.

19 MR. KATAEV: I'm trying to skip over ones that I  
20 don't need.

21 Q On April 20th, Tiffany Uribe of IME Companions observed  
22 an IME for Gucciardo, correct?

23 THE COURT: Are you aware that on X Tiffany Uribe  
24 observed -- on April 20th, sorry. I cannot read off the draft  
25 here, but object April 20th, whatever year, Tiffany Uribe



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1 observed a --

2 THE WITNESS: No, I am not aware.

3 THE COURT: Okay.

4 Next question.

5 Q And on the same date, Assaf Abdelatif, A-S-S-A-F,  
6 A-B-D-E-L-A-T-I-F, observed an IME for Ginarte, correct?

7 THE COURT: Are you aware or not?

8 THE WITNESS: I am -- I don't know, Your Honor, I am  
9 not aware.

10 Q Mr. Abdelatif was previously an observer for  
11 IME Companions, correct?

12 A Correct.

13 (Pause in the proceedings.)

14 THE COURT: Go ahead, Mr. Kataev.

15 Q In April of 23, you issued an invoice to Subin for IMEs  
16 observed in March and April of '23, correct?

17 A I issued an invoice to Subin in March.

18 The April 2023 invoice was something that Carlos Roa  
19 brought to them by some means that no one knows. This is the  
20 same man that purchased a Ph.D. from South America --

21 THE COURT: All right, Ms. Gelardi --

22 THE WITNESS: He is a con artist.

23 THE COURT: -- again, I do not want to hear  
24 unresponsive answers.

25 THE WITNESS: He --



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1 THE COURT: No, no. Stop, stop.

2 THE WITNESS: He disguises himself --

3 THE COURT: Stop speaking.

4 Mr. Kataev, do you want to show her that document  
5 that you are saying she issued, whatever the invoice is?

6 (Exhibit published.)

7 MR. KATAEV: This is a copy of the document filed at  
8 ECF.

9 THE WITNESS: What is this?

10 MR. KATAEV: 220-3.

11 THE COURT: Okay.

12 The question is: Have you ever seen this document  
13 before? And you should show her the number of pages, or the  
14 different pages, rather.

15 Q Do you recognize this invoice that was submitted by  
16 plaintiff to the Court?

17 A I did invoice Subin for March of 2023.

18 THE COURT: So you invoiced Subin & Associates for  
19 services provided by IME Companions in March.

20 THE WITNESS: Of 2023. I did, Your Honor.

21 THE COURT: All right.

22 Q And previously, when this exhibit was presented by the  
23 plaintiff to the Court, you claimed that it was falsified,  
24 correct?

25 A I claimed the April invoice was falsified. And I believe



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1 you were supposed to bring someone in to testify to its  
2 authenticity.

3 THE WITNESS: Is that correct, Your Honor?

4 MR. KATAEV: Strike as nonresponsive.

5 THE COURT: No questions of me.

6 Mr. Kataev, let's go on.

7 Q But you never presented any evidence to show that that  
8 invoice was falsified, correct?

9 MR. WARNER: Objection, Your Honor.

10 THE COURT: Overruled.

11 Did you present any evidence to show that the  
12 invoice was falsified?

13 THE WITNESS: The only evidence I have is that I  
14 never got paid.

15 THE COURT: All right.

16 Next question.

17 Q Regardless of whether you got paid, you issued this  
18 invoice, correct?

19 A If I never got paid -- usually attorneys pay their  
20 invoice, Mr. Kataev.

21 Q In order for you to get paid, you have to issue the  
22 invoice, correct?

23 A Mr. Kataev, you have to ask the question to someone from  
24 Subin Associates.

25 Q So you're refusing to answer whether you issued this



1 invoice?

2 MR. WARNER: Objection, Your Honor. She's already  
3 testified that she didn't issue an April invoice.

4 THE COURT: Overruled.

5 THE WITNESS: I did not issue an April invoice.

6 THE COURT: Okay.

7 Mr. Kataev, can you clarify the date of the invoice  
8 is April 1, 2023.

9 Do you mean did she invoice for services provided in  
10 April or did she send it an invoice for services provided in  
11 March that is dated April 1, 2023?

12 So I am overruling the objection but you need to  
13 clarify your question.

14 Q In this invoice the date is March 1st, 2023, correct?

15 THE COURT: For the services, not for the invoice  
16 date. The due date, I should make clear.

17 MR. KATAEV: I'm asking the date of the invoice is  
18 March 1st, 2023.

19 Q Correct?

20 A Yes.

21 Q But this invoice has service dates in March of '23 and in  
22 April of '23, correct?

23 A Those are two separate invoices, Mr. Kataev. You can't  
24 act like they're one.

25 Q Okay.



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1 But you issued both of these invoices, correct?

2 A I issued March.

3 Q So you deny issuing --

4 A I deny issuing April.

5 Q Okay.

6 A And I know Carlos was the one who fabricated it.

7 Q If you didn't present any evidence that it was  
8 fabricated, correct?

9 A I did -- I'm sorry.

10 THE COURT: Sustained. Asked and answered.

11 Let's move on.

12 Q Okay.

13 A Just like he fabricated his JD or his doctorate of law.

14 THE COURT: Okay.

15 Let's strike that. It is unresponsive. There was  
16 no question.

17 Q You issued this invoice in order to secure payment for  
18 all work completed after March 10th?

19 THE WITNESS: I believe I answered that question,  
20 Your Honor.

21 THE COURT: Okay.

22 Let him finish the question, then I will decide if  
23 you have already answered it or not.

24 Go ahead, Mr. Kataev.

25 Q You issued these invoices to secure payment for work



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1 performed after March 10th, 2023, correct?

2 THE COURT: All right.

3 Mr. Kataev, you need to tighten up that question.

4 Why don't you show her the actual invoice that you  
5 say was for services after March 27, 2023, because she is  
6 correct that you seem to have showed her two separate  
7 invoices; one of which she denies sending.

8 (Exhibit published.)

9 Q In the March invoice that you did send, there are service  
10 dates for March 10th and beyond, correct?

11 A That is correct.

12 THE COURT: What is the last date of service,  
13 Mr. Kataev, for the -- in the March invoice?

14 MR. KATAEV: March 30th, Your Honor.

15 THE COURT: All right.

16 And is it correct that you sent an invoice billing  
17 for services provided on March 30th, 2023?

18 THE WITNESS: Yes, Your Honor.

19 THE COURT: All right.

20 May I ask, are any of these individuals for whom  
21 services were provided, were they on the prohibited list,  
22 Ms. Gelardi?

23 Do you know if any of these individuals, rather the  
24 law firms for whom you provide these services, were on the  
25 prohibited list?



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1 THE WITNESS: This is all Subin, Your Honor.

2 THE COURT: Oh, it is all Subin. Okay.

3 So Subin was on the prohibited list. You were aware  
4 of that, right?

5 That's the question.

6 THE WITNESS: Yes.

7 THE COURT: Were you aware that they were on the  
8 prohibited list after March 27, 2023?

9 THE WITNESS: That's what I wanted to say is --

10 THE COURT: No, the question is: Did you know that?

11 THE WITNESS: I was under the assumption that I was  
12 not supposed to service anyone after -- sometime in April or  
13 in that range. It wasn't in March, Your Honor.

14 THE COURT: That was your belief, is that somehow --

15 THE WITNESS: Yeah.

16 THE COURT: -- you were not to provide service for  
17 those on the prohibited list starting in April?

18 THE WITNESS: Yes.

19 I even think --

20 THE COURT: No, that is all right. That is your  
21 answer.

22 Let's go, Mr. Kataev.

23 MR. KATAEV: Okay.

24 BY MR. KATAEV:

25 Q You deny invoicing Subin for IMEs observed in April,



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1 correct?

2 A I do.

3 Q Okay.

4 But on April 7th of 2023, Christian Hogarth observed  
5 an IME for Subin, correct?

6 A Was it for IME Companions?

7 THE COURT: The question is do you remember?

8 THE WITNESS: I don't, but I need to know what  
9 company -- these are independent contractors, Your Honor.

10 THE COURT: All right.

11 The question is what do you know? Do you know if  
12 Christian Hogarth provided an IME on April 7th, 2023, for  
13 Subin & Associates?

14 Do you know that; yes or no?

15 THE WITNESS: I -- I don't know offhand.

16 THE COURT: Okay.

17 Go ahead.

18 MR. KATAEV: Presenting what has been marked for  
19 identification as Plaintiff's Exhibit 29.

20 (Exhibit published.)

21 MR. KATAEV: I will represent to you that this is an  
22 IME report obtained through a subpoena.

23 THE COURT: Okay.

24 Mr. Kataev, you are doing exactly what I said we  
25 should not do. You can introduce this document later to prove



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1 that there was an IME, but she has given you the answer which  
2 is she does not know or remember if Mr. Hogarth did provide  
3 one.

4 Is that what this relates to?

5 MR. KATAEV: Yes.

6 THE COURT: Okay.

7 MR. KATAEV: I just want to ask one question and  
8 I'll move on.

9 Q In this report it says that Christian Hogarth observed an  
10 IME on April 7th, correct?

11 A For Client Exam Services, it seems.

12 Q That's what it says, right?

13 A Yes.

14 Q Okay.

15 But in the April invoice from IME Companions,  
16 the April 7th entry --

17 THE COURTROOM DEPUTY: Again, the microphone,  
18 Mr. Kataev.

19 Q The April 7th entry here relates to that same IME,  
20 correct?

21 MR. WARNER: Objection, Your Honor.

22 He's using the document that's not in evidence to  
23 compare to another document that's not in evidence.

24 THE COURT: Agreed.

25 Why don't you save it for argument. Right now this



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1 witness cannot authenticate the April invoice. She is only  
2 authenticating the March 1st.

3 THE WITNESS: Your Honor --

4 THE COURT: No, no. There is no question pending  
5 before you.

6 Go ahead.

7 Q Isn't it true that IME Companions invoiced Subin for IMEs  
8 observed by Client Exam Services?

9 A Mr. Kataev, Carlos Roa has friends in Subin. He worked  
10 for Subin for three years. He is a con artist and a fraud who  
11 purchases Ph.D.s from South America.

12 THE COURT: Okay.

13 Strike as not responsive.

14 Let's move on, Mr. Kataev. You need to prove your  
15 facts not through this witness -- or those facts not through  
16 this witness.

17 Q Did you ask someone from Subin to corroborate the  
18 fact --

19 MR. KATAEV: Withdrawn.

20 Q Did you ask someone from Subin to corroborate that this  
21 invoice is falsified?

22 MR. WARNER: Objection, Your Honor. When?

23 MR. KATAEV: At any time.

24 A No.

25 Q And no one from Subin is here to corroborate your



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1 testimony that this is a false invoice --

2 THE COURT: Mr. Kataev, I am going to strike that  
3 question. That is argument.

4 Do not ask this witness -- the witness these  
5 questions.

6 Let's go on.

7 Q When was the last time you spoke to Eugene Liddie for any  
8 reason?

9 THE WITNESS: The last time I spoke to Eugene was  
10 when they filed this new motion, Your Honor. And I had to  
11 call and apologize to him and tell him that they dragged him  
12 back in.

13 THE COURT: All right.

14 Next question.

15 Q To your knowledge, did your attorney, Mr. Warner,  
16 represent you, your husband and Eugene Liddie, correct?

17 A What? Not that I know of.

18 Q To your knowledge, did your attorney, Mr. Warner, draft  
19 Liddie's declaration in this case?

20 A No, not at all to my knowledge.

21 Q Are you --

22 THE WITNESS: I don't understand the question.

23 THE COURT: Do not direct anything to me.

24 A I don't understand the question.

25 MR. KATAEV: I'm moving on.



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1 THE COURT: Mr. Kataev, I want to remind you of the  
2 time limit, so you should use your time wisely.

3 Q Are you familiar with a company by the name of  
4 Accompanied Exam Services?

5 A I've heard of them. I'm not familiar with who they are.

6 Q Did you refer Subin to Accompanied Exam Services after  
7 making Companions inactive?

8 A To my knowledge, I do remember giving options to Subin as  
9 to other companies that exist.

10 Q Accompanied Exam Services was the only option you  
11 provided to Subin, correct?

12 A I -- I don't even know who they are. I just threw it out  
13 there.

14 THE COURT: What do you mean you do not know who  
15 they are? If you referred them --

16 THE WITNESS: I heard of them.

17 THE COURT: All right.

18 THE WITNESS: -- briefly.

19 THE COURT: All right.

20 Go ahead.

21 Q You recommend -- you recommended Accompanied Exams and  
22 Subin took your recommendation, correct?

23 A I don't know if they took my recommendation.

24 MR. KATAEV: I'm going to present what's been marked  
25 as Plaintiff's Exhibit 37 for identification.



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1 (Exhibit published.)

2 Q Ms. Gelardi, this is an e-mail that you sent to Mr. Baum  
3 at Subin on March 30th, 2023, correct?

4 A If you say so, yeah. I'm going to say correct.

5 MR. KATAEV: Your Honor, I offer this into evidence  
6 as Plaintiff's Exhibit 37.

7 THE COURT: Admitted.

8 (Plaintiff's Exhibit 37 received in evidence.)

9 THE COURT: Go ahead.

10 Q Subin was the biggest customer of IME Companions,  
11 correct?

12 A I do believe so, yes.

13 Q And this e-mail was sent three days after the March 27,  
14 2023, expanded preliminary injunction, correct?

15 A Yes.

16 Q And Accompanied Exams performs the same services as  
17 IME Companions, correct?

18 A I don't know, actually. Do they even have a website?

19 Q How did you become aware of Accompanied Exams?

20 A I -- I don't recall, but I believe someone told me about  
21 them.

22 Q When did you become aware of them?

23 A I don't recall, Mr. Kataev.

24 Q Who owns Accompanied Exams?

25 A I don't know.



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1 Q Do you operate Accompanied Exams?

2 A I do not.

3 THE COURT: Can I ask a question?

4 Why did you recommend them? Or anyone?

5 THE WITNESS: I -- I didn't have to. I just wanted  
6 to -- to give them an option. I don't even know if they went  
7 with it.

8 THE COURT: Why? Why did you want to give them an  
9 option?

10 THE WITNESS: Because they were very good to me,  
11 Your Honor. Subin and I worked very close. We were --

12 THE COURT: So you recommended them to a company  
13 that you had no idea how good they were or not?

14 THE WITNESS: I never said that they were good,  
15 Your Honor. I just said, hey, I heard of this company, if you  
16 want to try them out. I never said that they were good.

17 THE COURT: But you recommended them, you said,  
18 because you wanted to do right by Subin, so you recommended  
19 them to a company that you knew nothing about?

20 THE WITNESS: Yeah. Yeah, that is -- that is  
21 correct, Your Honor. I could have recommended them to Guards.  
22 I could have recommended them to other companies. I just  
23 didn't know enough about -- I just didn't know who they wanted  
24 to work with, because they were very particular, Your Honor.

25 THE COURT: And was part of your motivation to have



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1    them not work with plaintiff anymore?

2               THE WITNESS: Your Honor, they would never work with  
3    the plaintiff.

4               THE COURT: The question is: What was your  
5    motivation?

6               THE WITNESS: There was no motivation.

7               THE COURT: Well --

8               THE WITNESS: Zero motivation.

9               THE COURT: You went out of your way to find another  
10   company to recommend to them because, you said, you wanted to  
11   do right by them, correct?

12              THE WITNESS: I don't even know if it was to do  
13   right by them. It's more like -- it was more like, hey, you  
14   know, try this. Maybe they're good. I heard of them. It  
15   wasn't even to -- I don't --

16              THE COURT: That is not what the e-mail said,  
17   though, was it? It said: I recommend.

18              Perhaps you could put it back up there, Mr. Kataev.  
19              (Exhibit published.)

20              THE COURT: I recommend Accompanied Exams.

21              THE WITNESS: Yeah, I mean, I might have wrote that,  
22   Your Honor, but again, I don't even know this company. I just  
23   recommended them, because I know that they needed someone to  
24   work with.

25              THE COURT: All right.



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1 Go ahead, Mr. Kataev.

2 Q Subin Associates responded through Arnie Baum and said  
3 they will take your recommendation, correct?

4 A That's -- that's what the second e-mail says, correct.

5 MR. KATAEV: I'm going to --

6 Q Accompanied Exam Services was created on March 13th,  
7 2023, correct?

8 A I don't know.

9 MR. KATAEV: I'm going to present what's been  
10 previously marked for identification as Plaintiff's  
11 Exhibit 33.

12 (Exhibit published.)

13 MR. KATAEV: It's a publicly-filed document.

14 THE COURTROOM DEPUTY: I'm sorry is that 33 or 38?

15 MR. KATAEV: 38, sorry.

16 Q Based on this publicly-available information,  
17 accompaniedexams.com was formed on March 13th, 2023, correct?

18 A That's what it says.

19 Q And that's three days after this Court's March 10th,  
20 2023, temporary restraining order went into effect, correct?

21 A If that's what it says.

22 Q Now, you deny owning or operating Accompanied Exams,  
23 correct?

24 A Yes.

25 Q But does Accompanied Exams provide you any financial



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1 benefit for serving Subin?

2 THE WITNESS: I don't think Subin ever used  
3 Accompanied Exams, Your Honor.

4 THE COURT: The question -- go ahead.

5 A No, I received nothing.

6 Q Was there ever any deal with Accompanied Exams?

7 A No.

8 Q Are you familiar with a company by the name of IME Legal  
9 Reps?

10 A I am.

11 Q Okay.

12 THE COURT: Can I ask you one question.

13 The registrant address, which is in Tempe, Arizona,  
14 I assume, do you recognize that address?

15 THE WITNESS: No, Your Honor.

16 THE COURT: All right.

17 Go ahead.

18 MR. KATAEV: I will represent to the Court that that  
19 is a --

20 THE COURT: No, do not do that.

21 Keep going.

22 Q Are you familiar with a company by the name of IME Legal  
23 Reps?

24 A Yes.

25 Q IME Legal Reps perform IME observer services for law



1 firms and personal injury plaintiffs in New York, correct?

2 A I believe so.

3 Q And do you know who owns IME Legal Reps?

4 A I do.

5 Q Who is it?

6 A Eugene Liddie.

7 Q And do you have any ownership in IME Legal Reps?

8 A No, I do not.

9 Q Isn't it true that you formed IME Legal Reps in order to  
10 circumvent this Court's orders?

11 THE WITNESS: No, Your Honor.

12 Q Do you have any financial stake in IME Legal Reps?

13 THE WITNESS: No, Your Honor.

14 Q Isn't it true that you're operating IME Legal Reps by  
15 using Liddie as your front man?

16 THE WITNESS: No, Your Honor.

17 Q Do you recognize that because of this Court's orders that  
18 you cannot openly serve plaintiff's customers or --

19 MR. KATAEV: Withdrawn.

20 Q You recognize that because of this Court's orders, you  
21 cannot openly serve customers on the enjoined customer's list,  
22 correct?

23 A I do now, yes. I did before. I do. I recognize.

24 Q You set up the e-mail address IMElegalreps@gmail.com,  
25 correct?



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1 A No.

2 Q You have access to that e-mail address, correct?

3 A No.

4 MR. KATAEV: I'm going to present what's been marked  
5 for identification as Plaintiff's Exhibit 39.

6 (Exhibit published.)

7 Q I will represent to you that this is an e-mail you  
8 received in response to a subpoena to Giant Partners.

9 A Okay.

10 Q In this e-mail exchange on April 11th, 2023, Corey  
11 Weissman says: Here are the credentials for the GoDaddy  
12 account for Safa at IME Legal Reps, correct?

13 A That's what it says.

14 Q And on the bottom are the credentials that you provided,  
15 correct?

16 A Those are the credentials that I provided to Eugene.

17 Q You provided the Go Daddy account information, including  
18 the user ID, customer number and password, correct?

19 A I provided -- in order to migrate the site and remove  
20 IME Companions, I -- I believe those are IME Companions's  
21 credentials that I needed to provide to Giant Partners in  
22 order to remove my domain so that they can enter Eugene's  
23 domain.

24 Q And if that's the case, why didn't you send that e-mail  
25 from IME Companions's e-mail address?



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1 A I never sent that e-mail.

2 Q This e-mail came from you, correct?

3 A No, it came from IME Legal Reps.

4 Q So you deny sending this e-mail?

5 A I deny sending this e-mail.

6 Q Who sent this e-mail, to your knowledge?

7 A I don't know. I'm going to assume it was Eugene.

8 Q And this is your password?

9 A Yes. That was my password.

10 Q Can you read that password for the record?

11 A Absolutely.

12 It's Levicunt62.

13 THE WITNESS: I'm sorry, Your Honor, but she put me  
14 through hell.

15 Q You bought the domain IMELegalReps.com on April 10, 2023,  
16 correct?

17 A No, I did not.

18 Q Who did buy it?

19 A I'm going to assume Eugene Liddie bought it.

20 THE COURT: Sustained.

21 I am not going to --

22 THE WITNESS: I read it all, Your Honor.

23 THE COURT: You can just say I do not know. You do  
24 not need to assume anything.

25 The answer is you do not know.



1 Q On the second page of this exhibit there's an e-mail from  
2 Mr. Weissman at Giant Partners dated April 10th, 2023, and it  
3 starts off with: Hi, Safa.

4 Do you see that?

5 A Yes, I do.

6 Q So in this e-mail, Mr. Weissman is corresponding with  
7 IMELegalReps@gmail.com with you, correct?

8 A No.

9 THE WITNESS: Your Honor, I worked with Corey  
10 Weissman when I had IME Companions.

11 Your Honor, this is an extremely incompetent company  
12 where we explained to them that we're migrating the site over  
13 and they continued to use my name. I never responded.

14 Q Is it your testimony that IME Companions and IME Legal  
15 Reps share a single GoDaddy account?

16 A Absolutely not. It is my testimony that my credentials  
17 to IME Companions was given to Eugene so that he can give it  
18 to Giant Partners to migrate the domains from one --

19 THE WITNESS: I don't know the tech process,  
20 Your Honor, but I know that I had to give the credentials so  
21 that they can remove my domain from the website and enter his.

22 Q Giant Partners is a marketing and web development  
23 company, correct?

24 A I believe so, yes.

25 Q And it's a company that you worked with when you were



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1 running IME Companions, correct?

2 A Yes, that is correct.

3 Q And to your knowledge, the same company, Giant Partners,  
4 served IME Legal Reps, correct?

5 A No. To my knowledge, I believe that the site was -- we  
6 used Giant Partners to migrate the site over.

7 Q To your knowledge, what is the sum and substance of the  
8 agreement between IME Legal Reps and Giant Partners?

9 A I wouldn't know that, Mr. Kataev.

10 Q When was the last time you spoke to anyone in Giant  
11 Partners?

12 A Well over a year ago.

13 Q When was the last time you attempted to contact anyone at  
14 Giant Partners?

15 A Well over a year ago.

16 Q Did you contact Giant Partners after a subpoena was  
17 issued to them in this case?

18 A No, I did not.

19 Q When you entered into an agreement with Giant Partners  
20 with IME Companions, how much was IME Companions supposed to  
21 pay for the services provided by them?

22 A I -- I don't --

23 MR. WARNER: Objection to form.

24 A I don't recall.

25 THE COURT: Overruled.



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1 Q Giant Partners was not fully paid for its services,  
2 correct?

3 A I -- I don't believe that's true. But I don't recall.

4 Q And Berkeley Research Group, the forensic examiner in  
5 this case, was not paid for its services either, correct?

6 A I believe there was a balance.

7 Q That balance remains unpaid to date, correct?

8 A Correct.

9 Q But while you were not paying the forensic examiner, you  
10 did retain, and pay, for the services of a private  
11 investigator, correct?

12 MR. WARNER: Objection, Your Honor.

13 Different times.

14 THE COURT: It does not matter.

15 Go ahead.

16 MR. KATAEV: Subject to connection, I will provide  
17 dates.

18 THE COURT: Okay.

19 Overruled.

20 Go ahead.

21 Q Did you pay --

22 A I did hire a private investigator to provide me evidence  
23 so that I can prove to this Court and Your Honor that Carlos  
24 is a con artist.

25 So yes, I did hire a private investigator to defend



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1 myself.

2 Q And you paid that private investigator \$1,500, correct?

3 THE WITNESS: Yes, Your Honor.

4 Q And that financial statement was made -- those payments  
5 were made totaling 1500 in November of 2022, correct?

6 A I wouldn't remember when, but it sounds about right.

7 Q I'm going to present a document just to refresh your  
8 recollection.

9 MR. KATAEV: For the record, it's Exhibit 40 and two  
10 pages within it, one lists a thousand dollar payment on  
11 November 2022 and then the other was a \$500 payment also on  
12 November 2022.

13 (Exhibit published.)

14 Q Does that refresh your recollection?

15 A It sounds about right, Mr. Kataev.

16 Q Have you hired any other private investigators --

17 THE COURT: Mr. Kataev, could you put that back up?  
18 I mean, even though I should not be seeing it, it is just to  
19 refresh recollection.

20 But what is the date, since that has come up as an  
21 issue?

22 November 2022.

23 Okay. Go ahead. Sorry.

24 MR. KATAEV: And the second one, Your Honor, is  
25 here.



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1 THE COURT: Yes, all right.

2 Go ahead.

3 Q Other than this private investigator, have you hired and  
4 paid for any other private investigators?

5 A No.

6 Q And when Giant Partners provided services to  
7 IME Companions, you paid them approximately \$43,500, correct?

8 A I -- I don't recall that number, but it -- it must have  
9 been in a time span. And it's usually -- I believe it was for  
10 marketing.

11 MR. KATAEV: I'm going to present to you what's been  
12 previously marked as Exhibit 41.

13 (Exhibit published.)

14 MR. KATAEV: And I'll represent to you that this is  
15 an invoice from Giant Partners.

16 Q Do you recognize this document?

17 A I don't recognize it, but I recall the amount.

18 Q You -- Giant Partners issued you an invoice at  
19 IME Companions on August 25th, 2022, correct?

20 A Yes.

21 MR. KATAEV: I offer this into evidence as  
22 Plaintiff's Exhibit 41.

23 THE COURT: Admitted.

24 (Plaintiff's Exhibit 41 received in evidence.)

25 Q On the third page of this invoice there is a payment



1 history showing each payment you made, correct?

2 A That is correct.

3 Q And for each month starting in August of 2022 through  
4 January of 2023, you paid Giant Partners \$7,250 a month,  
5 correct?

6 A That's what it shows.

7 Q So when you total six payments of 7250, that's about  
8 \$43,000, correct?

9 A Yes, that sounds about correct.

10 Q This Court required you to pay half the costs of the  
11 forensic examiner on May 13th, 2022, correct?

12 A I believe so.

13 THE WITNESS: Is that correct?

14 THE COURT: No questions --

15 A I believe so.

16 Q And my client asked the Court to reconsider and have you  
17 pay it in full. Do you recall that?

18 A No, I do not recall that.

19 THE COURT: Let's just put it this way. Instead of  
20 paying the bill that you owed to the examiners, you spent the  
21 money --

22 THE WITNESS: On the marketing?

23 THE COURT: -- on the marketing, if you want to call  
24 it that, or you paid it to Giant Partners, correct?

25 THE WITNESS: For marketing, yes.



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1 But Your Honor, they --

2 THE COURT: No, no. That is the answer.

3 THE WITNESS: -- they accepted credit cards.

4 THE COURT: No. That is the answer.

5 Okay. Let's go.

6 Q As of September 2023, your debt to the forensic examiner  
7 is outstanding at \$32,716.43, correct?

8 A I'm not sure, but if you say so.

9 THE COURT: Actually, let me follow up on what you  
10 said.

11 Is it your testimony that that company does not take  
12 credit cards?

13 THE WITNESS: I believe they do, Your Honor.

14 THE COURT: Did you ask them?

15 THE WITNESS: I think I did once.

16 THE COURT: But for some reason you think they do  
17 not take credit card and that is why you did not pay them?

18 THE WITNESS: I wouldn't be able to charge -- I  
19 don't have a credit card --

20 THE COURT: The question is: Why didn't you pay  
21 them?

22 THE WITNESS: I didn't have the money to pay them,  
23 Your Honor.

24 THE COURT: Did you inquire, though, whether you  
25 could pay them by credit card, just as you did with Giant



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1 Partners?

2 THE WITNESS: I might have, but I don't recall.

3 THE COURT: All right.

4 Go ahead, Mr. Kataev.

5 And Mr. Kataev, let me just say this: I do owe you  
6 an apology that you elicited the November 2022 date earlier,  
7 but I want to -- and the reason I was distracted is because I  
8 was looking at this Giant Partners exhibit you introduced,  
9 Number 39.

10 If you asked this question I apologize, but I want  
11 to make sure it is in the record.

12 The address listed for IME Legal Reps is 205  
13 Charleston Lane in Fate, F-A-T-E, Texas.

14 Is that an address you are familiar with?

15 THE WITNESS: No, Your Honor.

16 THE COURT: Where do you live in Texas?

17 THE WITNESS: I live in Cypress, Texas.

18 THE COURT: Do you have any idea why IME Legal Reps  
19 apparently has an office or is registered or incorporated in  
20 Texas where you live?

21 THE WITNESS: I do know, Your Honor.

22 THE COURT: What is the answer?

23 THE WITNESS: I believe that Liddie's brother lives  
24 at that address in Texas. And I believe he used his brother's  
25 address for tax purposes, possibly?



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1 THE COURT: All right.

2 Go ahead.

3 MR. KATAEV: Okay.

4 Presenting what's been previously marked for ID as  
5 44.

6 (Exhibit published.)

7 BY MR. KATAEV:

8 Q I'm representing to you that this is a letter that BRG  
9 sent to the Court on September 7th, 2023.

10 Do you see that?

11 A You're asking me?

12 Q Yes.

13 A Yeah, I see it.

14 Q In this letter, at the last paragraph, it says that the  
15 defendants currently have \$32,000 in unpaid fees, correct?

16 In this letter at the bottom of the page, the last  
17 paragraph, it says that: The defendants in this matter  
18 currently have \$32,716.46 in unpaid fees, correct?

19 A Yes, that is correct.

20 Q And at the last page of this exhibit, it shows all the  
21 invoices that have been issued and the payments you made,  
22 correct?

23 A That is correct.

24 Q And the first invoice was issued in August of 2022,  
25 correct?



1 A That's what it says, yes.

2 Q And the only payments that the defendants issued are the  
3 initial \$7,500 deposit, and a payment for the \$5,000 invoice,  
4 correct?

5 THE WITNESS: Your Honor, you know, I never  
6 understood the BRG invoices. I never understood them. I  
7 don't even know the total balance owed.

8 And I was under the impression, Your Honor, when you  
9 ordered the forensic, that it was going to be 30,000, split  
10 50/50. That was my -- that's what I thought was the  
11 forensic's fee. So when all these fees starting coming up, I  
12 really didn't under what they are.

13 THE COURT: Next question, Mr. Kataev.

14 Q You own paid \$12,000 to BRG, correct?

15 A Yes.

16 Q And this debt to BRG has been due since late last year,  
17 correct?

18 A Yes.

19 Q And meanwhile, during this time, you paid Giant Partners  
20 \$43,500, correct?

21 MR. WARNER: Objection, Your Honor.

22 At this time there was a zero balance, according to  
23 Mr. Kataev's own invoice, as at December 29, 2022.

24 The payments that he's talking about to Giant  
25 predate that.



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1 THE COURT: All right.

2 This is all argument, but what was your question  
3 again, Mr. Kataev?

4 Q The amount of 43,500 paid to Giant Partners is more than  
5 the 32,000 owed.

6 MR. WARNER: We'll stipulate that 43 is more than  
7 32, Judge.

8 THE COURT: Yes. Let's move on.

9 Mr. Kataev, a lot of this you can save for argument.  
10 You need not ask the witness these questions if you want to  
11 save for argument.

12 Q You were unable to pay BRG because you were paying Giant  
13 Partners, correct?

14 A No, that is not correct.

15 Q When you were working with Giant Partners for Companions,  
16 you disseminated plaintiff's customer list to them, correct?

17 A To BRG?

18 Q Yes.

19 A I disseminated the customer list to BRG?

20 Q Okay. I'm sorry, to Giant Partners, not to BRG.

21 THE WITNESS: Your Honor.

22 THE COURT: Answer the question. Do not look at me.

23 THE WITNESS: Your Honor, I have a folder of  
24 attorney list over 60,000. If that -- if that list was in  
25 that folder and I attached that folder to them, and it was in



1 there, that's the only thing that I could come up with.

2 THE COURT: The question is: Did you knowingly  
3 disseminate --

4 THE WITNESS: I did not knowingly disseminate it.

5 Q Okay.

6 On May 13th, 2022, this Court issued an order  
7 requiring you to, among other things, return any documents of  
8 the plaintiff, correct?

9 THE WITNESS: I believe that I printed out thousands  
10 of pages and I handed them over, Your Honor.

11 Q The question is: Does the order require you to return  
12 any of plaintiff's documents, to your knowledge?

13 A I -- I recall something like that and I recall -- the  
14 only reason I recall it is because I had to buy paper, so much  
15 paper, I printed thousands of pages and we handed them over to  
16 you.

17 Q Okay.

18 Now did Giant Partners ask you at any time to  
19 provide them with a list of customers or contents so they  
20 could build a marketing campaign for you?

21 THE WITNESS: Giant Partners offered me, Your Honor,  
22 they built a list of attorneys for me of over 50,000  
23 attorneys. They also did say if you -- oh, I do recall  
24 something.

25 I remember telling them your list -- nothing is



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1 coming from it. There's no substance. How come there's no  
2 business coming from the list?

3 They said -- and I said please send me your list  
4 because I need to see what kind of attorneys you have on your  
5 list. And it turns out that not all of them were personal  
6 injury. So they weren't -- it wasn't an effective list.

7 So they said, if you have the list, please send it  
8 over. And I forwarded over my file, my entire file of  
9 New York list.

10 THE COURT: Without screening it to make sure you  
11 were not sending names of --

12 THE WITNESS: Yes.

13 THE COURT: -- names on the enjoined list.

14 THE WITNESS: Right. Without -- without screening  
15 it and sending the marketing list for the plaintiff.

16 THE COURT: All right.

17 Go on, Mr. Kataev.

18 Q When you sent -- you testified earlier that you printed  
19 thousands of pages to return it to us, correct?

20 A That is correct.

21 Q And when you did so, you did not -- you did not remove  
22 yourself from the ability to access those documents, correct?

23 In other words, you didn't destroy what you had that  
24 belonged to plaintiff, correct?

25 A I believe I did. You guys destroyed it with the



1 forensic. My computer went into shock.

2 Q Okay.

3 A And I brought this up to BRG and I asked them what did  
4 you do? And they said sometimes that happens. They don't  
5 know.

6 But my -- my -- my database was -- was destroyed.  
7 So I was under the impression that that's what -- that was  
8 part of the forensic.

9 Q When you returned documents that belonged to the  
10 plaintiff, that was in 2022, correct, when this case first  
11 started?

12 A Yes, I believe so.

13 Q Okay.

14 So in other words, you shouldn't have had access to  
15 any of the plaintiff's documents after 2022, correct?

16 A Mr. Kataev, if that marketing list was in the list of  
17 other lists of my attorney's, it was inadvertent. It  
18 wasn't -- I had 21,000 attorneys of my own. 473 attorneys of  
19 the plaintiff's marketing list wouldn't have made a  
20 difference.

21 MR. KATAEV: I'm going to present what's been marked  
22 for identification as Plaintiff's Exhibit 45.

23 (Exhibit published.)

24 MR. WARNER: What's the number?

25 MR. KATAEV: 45.



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1 Q This is an e-mail exchange between you,  
2 Safagelardi@gmail.com with Giant Partners, correct?

3 A Yes, that is correct.

4 Q And in this e-mail exchange, you provided attachments,  
5 correct?

6 A Yes.

7 Q Going to the last page of the e-mail exchange, one of the  
8 attachments was --

9 THE COURT: Use the microphone.

10 Q Going to the last payment of this e-mail exchange, one of  
11 the attachments was the client list of IME Watchdog, correct?

12 A It has been brought to my attention, yes.

13 Q In other words, as of February 2023, when these emails  
14 were being exchanged, you still had access to IME Watchdog's  
15 customer list, correct?

16 A Okay, Mr. Kataev --

17 Q I just need a yes or no.

18 A No, you have to understand, that these are -- this is  
19 publicly-listed attorneys of -- this is a marketing list.

20 Q Was this attachment included in the e-mail; yes or no?

21 A It might have been -- yes, it was, actually,  
22 inadvertently.

23 Q And this is the same exact list that you sent to your  
24 accountant in 2017 before forming IME Companions, correct?

25 A No. I'm -- I don't believe so at all.



1 THE COURT: Could we go back for a minute.

2 That list, the customer list we were looking at,  
3 were you aware you were supposed to have returned that to  
4 IME Watchdog as part of the Court order?

5 THE WITNESS: Yes, Your Honor. I wanted to tell you  
6 that I never saw that list until this case happened.

7 So when Adam sent me that e-mail with that list,  
8 Adam Rosenblatt, who still works for her, when he sent me that  
9 list, I'm not very tech savvy. I'm going to admit that. I  
10 didn't even know there were tabs on the bottom.

11 So I even brought it to my attorney's attention,  
12 like, I never even saw this list. But my list --

13 THE COURT: What do you mean you never saw it?

14 THE WITNESS: I never seen that list before this  
15 case started.

16 THE COURT: Right.

17 But then the case started and a number of orders  
18 were issued, and one of those orders said you have to return  
19 whatever customer list was taken from IME Watchdog.

20 And so you were aware of that list after the case  
21 started and after that order issued, were you not?

22 THE WITNESS: Yes, ma'am.

23 THE COURT: But you did not return it.

24 THE WITNESS: I did return it.

25 THE COURT: But you emailed it to these folks. You



1 say inadvertently, but you still have had the list.

2 THE WITNESS: Your Honor, when you open a list, it  
3 downloads. Anything that says list, I put into a file. I  
4 have a file -- like I said, I'm not very tech savvy, but I try  
5 to put everything -- I try to organize it to the best of my  
6 ability.

7 So I have all my lists in a file that says, you  
8 know, marketing list, so that I can provide to my -- whatever  
9 marketing company that I use.

10 THE COURT: That is right.

11 And this file of yours contained this IME Watchdog  
12 list, hold on, that you were supposed to have returned but did  
13 not, correct?

14 THE WITNESS: I was supposed to delete it and I  
15 guess I -- it was -- I don't know how I didn't delete it, but  
16 I know I returned thousands of pages of their information.

17 THE COURT: All right.

18 Let's go on, Mr. Kataev.

19 MR. KATAEV: All right.

20 BY MR. KATAEV:

21 Q Prior to using Giant Partners for marketing and website  
22 purposes, you worked with a company called Lumina Systems,  
23 correct?

24 A Correct.

25 Q And you utilized Lumina initially to build



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1 IME Companions's website, correct?

2 A Yes.

3 Q This is the same website that you sold to Mr. Liddie,  
4 correct?

5 A Yes.

6 Q You spent approximately \$30,000 to build that website,  
7 correct?

8 A It sounds about right.

9 Q Okay.

10 THE COURT: Could we go back, Mr. Kataev. I  
11 apologize.

12 How many attachments did you send, Ms. Gelardi, with  
13 this e-mail that went to Giant Partners?

14 THE WITNESS: Maybe five or six, Your Honor.

15 THE COURT: Okay.

16 So there are five documents, that is what it  
17 indicates.

18 You are saying you did not look at the one that said  
19 or any of these before you sent them?

20 THE WITNESS: No.

21 THE COURT: There are only five.

22 THE WITNESS: I only read the titles, Your Honor.

23 And what I -- the way it's listed -- the way it's  
24 listed, like, for example, I have P.A. list. I have Houston  
25 list. I have -- and the way it's list -- so I have Houston



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1 file. I have a Philadelphia file. I have a New Jersey file.  
2 So if that one was inadvertently entered into the New York  
3 file, and it was supposed to be deleted, it's -- I mean, it's  
4 a marketing list of attorneys that want to be found.

5 THE COURT: All right.

6 Go ahead, Mr. Kataev.

7 BY MR. KATAEV:

8 Q Isn't it true that all five of these lists are from  
9 IME Watchdog?

10 A Absolutely not. I paid for these lists. I built them  
11 myself.

12 Q You just testified that you spent about \$30,000 to build  
13 the IME Companions's website with Lumina, correct?

14 A Yes.

15 Q And you ultimately sold that website for only \$4,300,  
16 right?

17 A Yes.

18 Q You did not sell the website to Liddie for fair market  
19 value, did you?

20 A We sold the website for what we needed at the time.

21 Q To your knowledge, did you sell the website for fair  
22 market value when you sold it for 4300 in light of the fact  
23 that you paid 30,000 to build it?

24 A It's not worth much if I can't use it, Mr. Kataev. So  
25 yes, I believe I sold it for whatever it -- I sold it for more



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1 than what it was worth because I wasn't able to use it.

2 THE COURT: Hold on one second.

3 (Pause in the proceedings.)

4 THE COURT: Mr. Kataev, I do not know how much more  
5 you are going to explore on this topic, but remember, I want  
6 to hear about the property issue as part of your attachment  
7 motion, and by noon, quite honestly, you will have exhausted  
8 your part of the hearing and I want to make sure you touch on  
9 that topic as well.

10 MR. KATAEV: We're going to touch on the properties  
11 with Mr. Gelardi.

12 THE COURT: Okay. All right. Fair enough.

13 So everyone knows, we are going to take a lunch  
14 break at noon, from noon until 1:00, roughly. Okay.

15 BY MR. KATAEV:

16 Q You previously testified about The IME Company. That  
17 company was previously called the IME Advocate Company LLC,  
18 correct?

19 A There was no company established, IME Advocates. I was  
20 playing around with what I wanted to name the company in  
21 Houston. But there was no actual business established.

22 Then when I made -- when I decided on the actual  
23 name of the company is when I established the LLC for the  
24 business.

25 Q You previously represented to the Court by your counsel



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1 that you are out of this business and moved to Texas, correct?

2 A Yes.

3 Q That's not true, is it?

4 A Why is that?

5 Q You're still working with a company called IME Company in  
6 Texas, aren't you?

7 A I am working with The IME Company in Texas. I'm trying  
8 to.

9 Q Does The IME Company serve law firm customers in --

10 MR. KATAEV: Withdrawn.

11 That's already established.

12 (Pause in the proceedings.)

13 Q You're familiar with the fact that IME Legal Reps has a  
14 website, correct?

15 A Yes.

16 Q And in order to have a website, a domain name must have  
17 been purchased, right?

18 A Yes.

19 Q You purchased IME Legal Reps domain name, no?

20 A Absolutely not.

21 Q Regardless of who purchased it, do you know when it was  
22 purchased?

23 A No.

24 MR. KATAEV: I'm going to present to you what's been  
25 marked for identification as Plaintiff's Exhibit 53. I will



1 represent to you it's a publicly-available document --

2 (Exhibit published.)

3 MR. KATAEV: -- relating to IMELegalReps.com.

4 Q This exhibit states that IMELegalReps.com was created on  
5 April 10th, 2023, correct?

6 A That's what it says, yes.

7 Q And your testimony is that you had nothing to do with  
8 creating that website, right?

9 A Yes. Not creating the website. You said nothing to do  
10 with purchasing that domain?

11 Q Fair enough.

12 You didn't purchase the domain.

13 A Yes.

14 Q But you were involved in creating the website for IME  
15 Legal Reps, right?

16 A No. I was involved in migrating the website over. I was  
17 only involved for a short period of time in the migration, a  
18 matter of days for it to be handed over to Eugene, and I have  
19 not been involved since.

20 Q You communicated with Giant Partners regarding this  
21 transfer of information from IME Companions to IME Legal Reps,  
22 right?

23 A I had to.

24 Q And just for the record, how do you spell Eugene Liddie's  
25 last name?



1 A L-I-D-D-I-E.

2 Q But you've spelled his name in e-mail correspondence as  
3 L-I-D-D-Y, correct?

4 A No.

5 MR. KATAEV: Let's present what's been marked for  
6 identification as Plaintiff's Exhibit 54.

7 (Exhibit published.)

8 Q This is an e-mail exchange in April of 2023 between  
9 IMELegalReps@gmail.com and Giant Partners, correct?

10 A I am not on this e-mail, Mr. Kataev.

11 Q Isn't it true that you sent this e-mail at the top: Hey,  
12 everyone. This is Eugene Liddie, L-I-D-D-Y?

13 A No.

14 Q It's your testimony that Eugene Liddie spells his own  
15 last name wrong?

16 MR. WARNER: Objection, Your Honor. This document  
17 is not in evidence. The witness is not aware of the document.

18 THE COURT: Overruled. Overruled.

19 The question is: Can you answer that?

20 In other words, you are disclaiming having written  
21 this e-mail, correct?

22 THE WITNESS: I did not write this e-mail, Your  
23 Honor.

24 THE COURT: All right.

25 BY MR. KATAEV:



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1 Q In this e-mail on April 14th, 2023, at 12:44 p.m., Giant  
2 Partners says "hey, Safa" in communicating with you, correct?

3 A Okay. No, Mr. Kataev.

4 Giant Partners was totally confusing the entire --  
5 they put: Hey, Safa, on a lot of things that I never  
6 responded to that I believe Eugene had to tell them to please  
7 stop including me.

8 Q You're denying that these e-mail exchanges are between  
9 you and Giant Partners?

10 A Yes, I'm totally denying that.

11 Q Isn't it true that IME Legal Reps had an e-mail address  
12 with its own domain name?

13 A What do you mean?

14 Q In other words, didn't IME Legal Reps have an e-mail  
15 address where it was eugene@IMELegalReps.com or  
16 info@IMELegalReps.com?

17 A I believe so.

18 Q Why is it that there's also an IMELegalReps@gmail.com  
19 address?

20 A I don't know.

21 THE COURT: Sustained.

22 I mean, she has already told you she does not know  
23 about this e-mail so you are going to have to figure out  
24 another way to -- you can present that argument, if you want,  
25 or ask another witness, for example, Mr. Liddie.



1 Q In this e-mail exchange on April 14th, 2023, it says:  
2 Safa Gelardi wrote: Please deactivate IMECompanions.com.

3 Do you see that?

4 A Okay. Yes, I do see that.

5 Q Okay.

6 So in this e-mail exchange, at least, you do  
7 acknowledge that you communicated with Giant Partners,  
8 correct?

9 A Yes.

10 MR. KATAEV: Your Honor, based on the witness's  
11 testimony, I offer this into evidence as Exhibit 54.

12 THE COURT: It contains extraneous emails, but I  
13 will admit it, just for what it is worth. I assume you will  
14 ask other witnesses about it.

15 (Plaintiff's Exhibit 54 received in evidence.)

16 Q In this exchange you're asking Giant Partners to: Set  
17 things up such that when a client books an IME, we should get  
18 an e-mail to info@IMELegalReps.com, correct?

19 A That's how it should have been. This is part of the  
20 migration, yes.

21 Q Before this April 14th, 2023, e-mail, anyone that booked  
22 would receive -- you would receive an e-mail at  
23 IMECompanions.com, correct?

24 A Yes.

25 Q And that continued to be the case through April 14th,



1 2023, until this change was done, correct?

2 A Mr. Kataev, nobody books online. Everyone sends emails.

3 But yes, we want them to, and that would have been  
4 the case.

5 Q And between the period of March 23rd until April 14th,  
6 '23, if you did receive an e-mail, you would pass that on to  
7 Mr. Liddie, correct?

8 A I didn't receive any emails and if I would have, I  
9 probably would have assumed that it was for -- I don't know,  
10 honestly. We didn't get that scenario, so I don't know.

11 THE COURT: Mr. Kataev, can I ask a question?

12 I have to ask you, Ms. Gelardi, that e-mail that you  
13 clearly sent from your Gmail account on April 14, 2023, says:  
14 Please deactivate IMECompanions.com. It is very important  
15 that the domain IMECompanions.com be deactivated ASAP.

16 And then you write: IMELegalReps.com has to go up  
17 ASAP, and when a client books, we should get an e-mail to  
18 info@IMELegalReps.com. It is imperative that is done ASAP.

19 THE WITNESS: Yes, Your Honor.

20 THE COURT: That sentence: We should get an e-mail  
21 at info@IMELegalReps.com creates a pretty strong inference  
22 that you were involved with running IMELegalReps.com.

23 Tell me why that is not a reasonable inference.

24 THE WITNESS: Your Honor, that's not a reasonable  
25 inference.



1 In business we say we all the time. We at  
2 IME Companions. I mean, maybe I -- I -- I phrased it wrong.  
3 Maybe I don't have the best grammar, but this is part of the  
4 migration and you can actually confirm this with Giant  
5 Partners. We told them that IME Companions has to be gone and  
6 everything should be migrated over to Legal Reps.

7 THE COURT: And that: We should be getting client  
8 bookings via e-mail.

9 Those are your words, even though you just told --

10 THE WITNESS: Yeah.

11 THE COURT: -- Mr. Kataev that nobody books online.

12 But putting that aside, you used the word "we,"  
13 which strongly suggests that you and Mr. Liddie were working  
14 together on IMELegalReps.com.

15 I am giving --

16 THE WITNESS: Your Honor --

17 THE COURT: -- you a chance to explain why that is  
18 not what it means.

19 THE WITNESS: We were working -- we were working  
20 together on the migration only. We were only working together  
21 to migrate the website over.

22 So if I inferred "we," the only thing I could think  
23 of is Eugene and I need this to be done ASAP.

24 THE COURT: And you did not say Mr. Liddie should be  
25 getting those bookings.



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1 THE WITNESS: Mr. Liddie's on the e-mail.

2 THE COURT: All right.

3 Go ahead, Mr. Kataev.

4 MR. KATAEV: Going back to the most recent e-mail in  
5 this exchange.

6 BY MR. KATAEV:

7 Q At the end you say: Please -- the IMELegalReps@gmail.com  
8 says: Please communicate only with me as Safa is no longer  
9 involved.

10 Do you see that?

11 A Mr. Kataev, did you just say that I said?

12 Q I'm saying whoever at IMELegalReps@gmail.com wrote:  
13 Please communicate only with me as Safa is no longer involved.

14 Correct?

15 A I did not write that e-mail, Mr. Kataev.

16 Q I'm just asking, is that what it says?

17 A That's what it says.

18 Q And this e-mail was sent one day after our order to show  
19 cause that led to the May 4th hearing, correct?

20 A I don't know.

21 Q You controlled the design of the IME Legal Reps's  
22 website, correct?

23 A No, I did not.

24 MR. KATAEV: I'm going to present what has been  
25 previously marked for identification as Plaintiff's



1 Exhibit 39.

2 (Exhibit published.)

3 MR. KATAEV: This is another e-mail we received in  
4 response to the subpoena to Giant Partners.

5 Q At the bottom of this chain someone at Giant Partners  
6 sends you an e-mail on April 12th saying: Hey, Safa, correct?

7 A Mr. Kataev, they sent many emails saying, Hey, Safa, and  
8 I never acknowledged any of them as I was no longer involved.

9 Q On April 13th someone at Giant Partners followed up with  
10 you and said: Hi, Safa.

11 Correct?

12 A Where is that? Oh.

13 It depends on to what e-mail it was sent to,  
14 Mr. Kataev.

15 Okay. Yes, so it was sent to me. That's fine, yes.

16 Q In this e-mail, Giant Partners asked you can we use the  
17 same colors at IME Companions, correct?

18 A Yes, that is correct.

19 Q And you directed Giant Partners to, I quote: Change it  
20 up a little bit.

21 Correct?

22 A Mr. Kataev, the IME --

23 Q Yes or no?

24 A No, I'm going to answer your question.

25 IME Companions's website was my vision, so I didn't



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1 want to give my vision to the IME Legal Reps. Eugene needed  
2 to create his own vision.

3 Q Instead of Mr. Liddie providing this vision, you gave the  
4 direction to change it up a little bit, correct?

5 A Yeah, I wanted it changed up.

6 THE WITNESS: That was my vision, Your Honor.

7 Q And the reason why you wanted it changed up is because  
8 you didn't want anyone to associate IME Legal Reps with  
9 IME Companions, correct?

10 A No, that's not why.

11 THE WITNESS: The reason why, if you really want to  
12 know, was because I was planning on reusing my vision,  
13 Your Honor, for whatever company I would want to start.

14 MR. KATAEV: I'm going to offer into evidence --

15 MR. WARNER: Objection, Your Honor.

16 MR. KATAEV: -- 57. It's an e-mail exchange that  
17 the witness acknowledges engaging in.

18 THE COURT: Could you move it over so I could see  
19 the e-mail.

20 Right. Okay. That is admitted. 57.

21 (Plaintiff's Exhibit 57 received in evidence.)

22 THE WITNESS: Your Honor, I haven't worked with  
23 Estefania.

24 THE COURT: There is no question pending.

25 Go ahead, Mr. Kataev.



1 MR. KATAEV: Okay, I'd like to present what has been  
2 previously marked for identification as Plaintiff's  
3 Exhibit 58.

4 (Exhibit published.)

5 Q This is another e-mail exchange between you and Giant  
6 Partners, correct?

7 A Where is -- where is the exchange?

8 THE WITNESS: This is the same one we just were  
9 talking about, no?

10 THE COURT: That is what it looks like.

11 MR. KATAEV: I'm presenting, Your Honor, because the  
12 other one did not have the e-mail address. So I just wanted  
13 to point out that the e-mail address is here, and I want to  
14 offer it into evidence as 58, based on the fact that  
15 Ms. Gelardi is on the chain.

16 THE COURT: Okay. 58 is admitted.

17 (Plaintiff's Exhibit 58 received in evidence.)

18 MR. KATAEV: And we are offering 59 for  
19 identification. I'm going to move on.

20 (Exhibit published.)

21 MR. KATAEV: For ID, 60. This is another e-mail  
22 exchange between Giant Partners, you personally, and IME Legal  
23 Reps, correct?

24 THE WITNESS: Yes.

25 Q And in this e-mail exchange, although



1 IMELegalReps@gmail.com is included -- I'm sorry.

2 In this e-mail address, IMELegalReps@gmail.com is  
3 not included, correct?

4 A I -- I believe it is included.

5 THE COURT: The e-mail address.

6 Q Do you see any e-mail address for IME Legal Reps in this  
7 e-mail?

8 A No, I don't, actually.

9 Q So in this e-mail exchange, Giant Partners is  
10 communicating directly with you on April 18th, 2023, regarding  
11 IME Legal Reps, correct?

12 A That's what it looks like, Mr. Kataev.

13 Again, I never responded because I had nothing to do  
14 with it.

15 Q Do you recall submitting a declaration under oath  
16 swearing that you had nothing to do with IME Legal Reps?

17 A And I still declare that under oath that I have nothing  
18 to do with IME Legal Reps.

19 Q Based on this e-mail, that testimony is not truthful,  
20 correct?

21 A How is that not truthful based on this e-mail?

22 I can say, hey, Mr. Kataev, hope all is well, wanted  
23 to check up on you. And if you don't respond, how does that  
24 make you --

25 THE COURT: Mr. Kataev, save it for argument. Let's



1 go on.

2 THE WITNESS: Your Honor, please --

3 THE COURT: No, no. There is no question pending.  
4 Your lawyer will redirect.

5 (Exhibit published.)

6 MR. KATAEV: I represent to you, Ms. Gelardi, that  
7 this is Exhibit 62, marked for ID. It's another e-mail  
8 exchange between IMELegalReps@gmail.com and Giant Partners.

9 Q Do you recognize this document?

10 A No, I do not.

11 Q All right.

12 In this exchange Giant Partners asks about a court  
13 date this week.

14 Do you see that?

15 A I do see that, yeah.

16 Q Do you have any knowledge as to what conversations  
17 occurred between Giant Partners, Mr. Liddie and you,  
18 concerning the court date?

19 A There is no conversation between Mr. Liddie, Mr. Corey  
20 and myself. There was a conversation between Corey Weissman  
21 and myself. I worked with these people for two-and-a-half  
22 years. I had a contract with them. I had 12 -- I had a  
23 12-month contract with these people. They wanted to know if I  
24 was going to continue with my marketing plan. And I said I  
25 won't know until after my court date if I'm going to remain



1 open, if I'm going to continue business, if I'm not going to  
2 continue business.

3 That was a conversation only between Corey Weissman  
4 and I, but yet these incompetent company continuously linked  
5 us.

6 THE COURT: Mr. Kataev, I cannot really see the  
7 salutation, but that was addressed to Mr. Liddie, I gather.  
8 Hi, Eugene?

9 MR. KATAEV: Yes, that's correct.

10 THE COURT: Okay.

11 Q This court date is in reference to the May 4th, 2023,  
12 hearing, correct?

13 A I'm going to assume so.

14 Did we have another one in May? I don't remember.

15 Q Okay.

16 To your knowledge, was there a decision by IME Legal  
17 Reps to pause any marketing efforts pending a determination of  
18 the May 4th hearing?

19 A I have no knowledge of what Eugene wanted to do with  
20 Legal Reps.

21 Again, I'm going to tell you. This was a  
22 conversation between Corey and I to continue my marketing for  
23 IME Companions that I had still maybe six more months of  
24 marketing in a contract with them.

25 MR. KATAEV: Okay.



1 I'm going to present to you what's been marked for  
2 ID as 63.

3 (Exhibit published.)

4 MR. KATAEV: This is an e-mail exchange between you,  
5 Giant Partners and whoever is using IMELegalReps@gmail.com.

6 Q Do you recognize this e-mail?

7 A I don't recognize it, but I mean, it's -- it's, I see it  
8 now.

9 Q In this exchange there's a reference by Corey Weissman at  
10 Giant Partners that one of you mentioned that you would have  
11 an update for Giant Partners after May 15th to let us know --  
12 to let Giant Partners know when they can start marketing  
13 campaigns.

14 Do you see that?

15 A Yes, I do.

16 Q And in that e-mail exchange it says that Giant Partners  
17 has not been able to get ahold of Eugene, correct?

18 A That's what it says, correct.

19 Q Giant Partners reached out to you when they could not  
20 reach Eugene, correct?

21 A So I -- they never reached out to me via phone call.

22 Mr. Kataev, you have submitted e-mail after e-mail  
23 after e-mail from Giant Partners and never submitted one  
24 response from myself -- oh, I'm sorry, you might have  
25 submitted one or two in which the migration happened, but



1 there was no response at all. All you submitted was emails  
2 from Giant Partners.

3 Q And you're ignoring the e-mail that you sent saying:  
4 Let's change it up a little bit?

5 A That I completely sent because it should be changed up.  
6 I sent that e-mail. I acknowledged sending that e-mail. I  
7 never denied that e-mail because it should be changed up.

8 That was my vision. That was my website. I think  
9 he should create his own vision. I don't see anything wrong  
10 with that.

11 Q Do you have any e-mail that you sent Giant Partners  
12 telling them to not contact you anymore?

13 A Okay. Mr. Kataev, you completely -- you want me to  
14 acknowledge everything, but then you guys don't acknowledge  
15 the fact that you have put me in deep depression and  
16 heightened my anxiety beyond belief. So, I don't know if I  
17 even had the energy or mindset to respond to anything.

18 THE COURT: Ms. Gelardi, are you claiming that you  
19 had deep depression during the period of time when all these  
20 emails are going back and forth?

21 THE WITNESS: Your Honor --

22 THE COURT: That is my question:

23 Were you in a deep depression when all of these  
24 emails were going back and forth, some of which you sent or  
25 received yourself?



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1 THE WITNESS: I had to help Eugene migrate the site  
2 over. I had been depressed for a long time now, Your Honor.

3 THE COURT: During this period of time, were you in  
4 a deep depression?

5 THE WITNESS: I've been in a depression for a very  
6 long time. I don't recall when my depression started. I just  
7 have not been myself, Your Honor.

8 THE COURT: Can I ask you another question.

9 The marketing campaigns that are referred to, could  
10 you clarify for me, this is multiple, more than one campaign,  
11 is one for IME Legal Reps --

12 THE WITNESS: Companions.

13 THE COURT: No, Legal Reps. One is for IME Legal  
14 Reps, right? And one is for IME Companions, your company.

15 THE WITNESS: My company, I entered into an  
16 agreement, Your Honor, a 12-month contract with Giant Partners  
17 to do my marketing. I had to end that agreement early because  
18 I didn't know where my company was going.

19 THE COURT: Right.

20 But as of May 19, 2023, you say: We can start the  
21 marketing campaigns after, I guess, 5/15, or that when you  
22 figured it out.

23 THE WITNESS: I -- I --

24 THE COURT: I am just asking what marketing campaign  
25 you are referring to.



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1 THE WITNESS: I never said any of that, Your Honor.

2 MR. WARNER: Your Honor, that's Mr. Weissman from  
3 Giant Partners. That is why this is --

4 THE COURT: Hold on, okay.

5 MR. WARNER: -- objectionable.

6 THE COURT: Well, it is a conversation.

7 So the question is: Mr. Weissman asked you about  
8 that.

9 Were there marketing campaigns, multiple, discussed  
10 with Mr. Weissman at the time, by you and/or Mr. Liddie? And  
11 if so, what are they?

12 THE WITNESS: Okay.

13 No conversations, Your Honor, ever occurred between  
14 Corey Weissman, Eugene Liddie and I about any marketing  
15 campaign to do with IME Legal Reps. The marketing campaign  
16 was done. I worked with these people for two -- well, Corey  
17 himself, two-and-a-half years on marketing for IME Companions.

18 THE COURT: So is that what this e-mail refers to?

19 THE WITNESS: I don't think so. I think this  
20 e-mail --

21 THE COURT: Well, do you remember, is my question.  
22 Do not guess. This is in May --

23 THE WITNESS: I mean --

24 THE COURT: Hang on.

25 -- on May 19, 2023.



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1 Do you know what he is referring to when he says:  
2 Let us know when we can start the marketing campaigns?

3 THE WITNESS: Campaigns, he wrote?

4 THE COURT: It is plural. That is what I am asking  
5 you about.

6 Do you recall what he was referring to? It was sent  
7 to you at your Gmail, I can see that.

8 THE WITNESS: I can see it's sent to my Gmail.

9 Your Honor, I can only assume --

10 THE COURT: No, no assumptions.

11 What do you remember, if anything?

12 THE WITNESS: All I remember is I had to halt my  
13 marketing for IME Companions and I told them, hey, look,  
14 depending on what happens in my case, I'll let you guys know  
15 whether I'm going to be back in business as IME Companions or  
16 not. For now, I can't continue marketing if I have no  
17 business. Market what?

18 THE COURT: So it is your testimony that all of  
19 these proposed April 2023 emails that the plaintiff has  
20 obtained from Giant Partners, even the ones that are addressed  
21 to you, had nothing to do with you being involved with IME  
22 Legal Reps marketing or business?

23 That is your testimony.

24 THE WITNESS: That is. But I do believe that  
25 they --



1 THE COURT: Sorry.

2 That is your testimony?

3 THE WITNESS: Say it again for me, Your Honor.

4 THE COURT: In other words, you are claiming that  
5 you were not involved at all in helping IME Legal Reps with  
6 their marketing.

7 THE WITNESS: Absolutely. That is my testimony.

8 THE COURT: Okay.

9 All right. Go ahead, Mr. Kataev.

10 BY MR. KATAEV:

11 Q And you're talking about IME Companions, even though this  
12 is after the March 27, 2023, order, after you admitted that  
13 you shut down Companions in response to that, correct?

14 A Mr. Kataev, I -- I didn't shut down. I went out of  
15 business. Maybe that was the word that was used, shut down.  
16 My company is still active. I was hoping to go back to  
17 business.

18 MR. KATAEV: I'm going to present what has been  
19 marked for ID as 64. It's another exchange with Giant  
20 Partners in which you are part of the e-mail.

21 (Exhibit published.)

22 Q Do you recognize this e-mail?

23 A I don't -- I don't recognize this e-mail.

24 Q Is that your e-mail address up top?

25 A Yeah, it is.



1 Q In the e-mail exchange below --

2 MR. KATAEV: Withdrawn.

3 Your Honor, I offer 64 in evidence based on her  
4 acknowledgment that this is an e-mail that she exchanged.

5 THE COURT: Yes. Admitted.

6 MR. WARNER: Objection, Your Honor.

7 THE COURT: It is admitted.

8 (Plaintiff's Exhibit 64 received in evidence.)

9 THE COURT: It is an e-mail that was sent to her  
10 Gmail. Whether she remembers it or not is for her to --

11 MR. WARNER: Your Honor, it's unauthenticated and  
12 the statements are an out-of-court statement by Mr. Weissman.  
13 How can this be admissible?

14 MR. KATAEV: Business record.

15 THE COURT: Well, it is also just a verbal act.

16 The question is -- it is not necessarily being  
17 offered for its truth. The question is, does she remember  
18 having these conversations.

19 MR. WARNER: Well, Your Honor, you can't admit it  
20 before he tells you what he's offering it for then.

21 THE COURT: Well, no, I am looking at it so those  
22 are the questions I will allow to be asked.

23 THE WITNESS: It wasn't a conversation, Your Honor.  
24 These are all one track, one sided. And I haven't seen one  
25 response from Eugene. I haven't seen one response -- I've



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1 seen one or two responses from myself early on in the  
2 beginning.

3 THE COURT: Okay.

4 THE WITNESS: These are not conversations --

5 THE COURT: Ms. Gelardi, leave that for your lawyer  
6 to argue.

7 Mr. Kataev, ask your next question.

8 BY MR. KATAEV:

9 Q On May 30th, 2023, Mr. Weissman reached out to you  
10 because he could not reach Mr. Liddie, correct?

11 A That's what the e-mail -- is this made to my e-mail? I  
12 can't see.

13 Q You're on the chain.

14 A Okay. Yes.

15 Q Okay.

16 The reason why Mr. Liddie was unresponsive, did not  
17 pick up his phone or respond to emails, is because he's a  
18 full-time police officer, correct?

19 A I don't know why he didn't pick up his phone, Mr. Kataev.

20 Q If you don't know, why didn't answer, why is it that  
21 Giant Partners is reaching out to you when he doesn't?

22 MR. WARNER: Objection, Your Honor. Calls for  
23 speculation.

24 THE COURT: Sustained.

25 Did you have any conversations with the Giant



1 Partners about you responding instead of Mr. Liddie?

2 THE WITNESS: No, Your Honor. I never responded. I  
3 never had -- I haven't spoke to Giant Partners since I told  
4 Corey look, I'm out of the game. I got to migrate this  
5 website. I'm selling it. Please assist us in moving this  
6 over. I have not communicated with them since.

7 THE COURT: So your testimony is that during the  
8 period reflected in these emails, you are not actually  
9 speaking to the people at Giant?

10 THE WITNESS: No, I was not.

11 THE COURT: And it is your testimony that all these  
12 salutations to you are their mistake, somehow, that you are a  
13 person to discuss these issues with?

14 THE WITNESS: I completely -- that's what I believe.

15 THE COURT: Okay.

16 THE WITNESS: I believe that they're confused --

17 THE COURT: No, no. Not what you believe.

18 The question is: Sorry. I apologize. I did ask  
19 you what you believe.

20 But you think that they are just incompetent, is  
21 what I think you said, correct?

22 THE WITNESS: I do think that they're incompetent,  
23 and they're confused, and they reach out to me to find Eugene.  
24 They reach out to Eugene --

25 THE COURT: And there is no basis for them to do



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1 that because you were not having any conversations with  
2 them --

3 THE WITNESS: I wasn't, no.

4 THE COURT: -- in between these emails.

5 THE WITNESS: Zero conversations, zero phone calls,  
6 zero texts, zero emails. Other than the ones that you've seen  
7 with the migration, Your Honor, I have not. And Corey can  
8 attest to that. I have not communicated with these people  
9 since the migration happened.

10 THE COURT: Okay.

11 THE WITNESS: There was nothing.

12 THE COURT: All right.

13 THE WITNESS: No conversation.

14 THE COURT: I think someone from Giant is going to  
15 be called as a witness so, obviously, we will hear what they  
16 have to say.

17 Go ahead, Mr. Kataev.

18 MR. KATAEV: I am presenting for ID what's marked as  
19 65. This is another e-mail exchange between you, Giant  
20 Partners and IME Legal Reps.

21 (Exhibit published.)

22 Q Do you recognize this document?

23 A I -- I -- I see it.

24 Q This is an e-mail that you exchanged with Giant Partners,  
25 correct, that you received?



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1 MR. WARNER: Objection, Your Honor. This is not an  
2 exchange. This is a deliberate effort --

3 THE COURT: Overruled.

4 Sit down, Mr. Warner. I am going to allow all these  
5 emails in that are addressed to her. She can deny that she  
6 ever looked at them, received them, responded to them.

7 MR. WARNER: I object to the use of the term  
8 exchange, Your Honor. This is not an exchange.

9 MR. KATAEV: I corrected and said received.

10 MR. WARNER: Exchange is when someone says something  
11 and someone says something back.

12 THE COURT: Fair enough. I understand that you  
13 dispute that they were an exchange.

14 Go ahead.

15 MR. KATAEV: And I corrected and said received.

16 Q This is an e-mail you received, correct?

17 A Correct.

18 Q Okay.

19 At the top of this e-mail there's a reference --  
20 there's a salutation: Dear Eugene and Safa, correct?

21 A Mr. Kataev, I introduced Eugene to Corey to migrate over  
22 the site.

23 They were under --

24 THE COURT: Hang on. Stop speaking.

25 Mr. Kataev, I think you are wasting precious time



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1 with going over all these emails. You are going to get the  
2 same response. I will allow you to introduce emails that have  
3 Ms. Gelardi's e-mail address on them.

4 Unless you want to ask her about a specific  
5 statement --

6 MR. KATAEV: Yes.

7 THE COURT: -- move on.

8 MR. KATAEV: I want to offer 65 in evidence.

9 MR. WARNER: Objection, Your Honor.

10 THE COURT: Overruled.

11 Is this an e-mail addressed to her?

12 MR. KATAEV: It is, Your Honor.

13 THE COURT: Okay.

14 They are all coming in. Your objection is reserved.

15 (Plaintiff's Exhibit 65 received in evidence.)

16 THE COURT: Go ahead.

17 Q Okay.

18 On the bottom --

19 THE COURT: Preserved. Sorry.

20 Go ahead.

21 (Exhibit published.)

22 Q On the bottom of this e-mail on June 8th, Giant Partners  
23 says to you: I have our team asking what is going on with  
24 this partnership.

25 Do you see that?



1 A I do see that.

2 Q The partnership refers to your partnership with  
3 Mr. Liddie, correct?

4 A Absolutely not. That is you misconstruing words.  
5 They're talking with a partnership between IME Legal Reps and  
6 Giant Partners.

7 Q In this e-mail exchange, Giant Partners says that they  
8 haven't been able to get ahold of either of you, correct?

9 MR. WARNER: Objection, Your Honor. You've allowed  
10 it into evidence, now it does speak for itself.

11 THE COURT: Overruled.

12 Do you want to comment on your understanding of  
13 this, if you recall seeing it?

14 Do you recall seeing this e-mail?

15 THE WITNESS: Recall? No.

16 But I -- I mean, they send an enormous amount of  
17 emails that I just -- if I'm not doing marketing, I'm not  
18 going to acknowledge it. I'm not working with it.

19 THE COURT: If you did not see it --

20 Do not ask her any more questions about it. You can  
21 make your arguments. She is not going to be able to provide  
22 any competent testimony about what she thought it meant  
23 because she does not recall seeing it.

24 So let's move on.

25 Q Your testimony is that your sole interaction with Giant



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1 Partners was related to the migration and nothing else,  
2 correct?

3 A Yes, that is correct.

4 MR. KATAEV: I'd like to offer -- I'd like to  
5 present what's been marked for ID as 66.

6 THE COURT: This is the last exhibit, Mr. Kataev,  
7 before the lunch break.

8 MR. KATAEV: Sure.

9 (Exhibit published.)

10 Q This is a request by you, Safa Gelardi, via Google Drive  
11 to the marketing collaterals folder for -- at Giant Partners,  
12 correct?

13 A That's what it looks like, yes.

14 Q If your sole exchange or interaction with Giant Partners  
15 was related to migrating, why would you be requesting access  
16 to marketing collaterals in late June of '23?

17 A I -- I don't actually recall this, but if I am requesting  
18 marketing collaterals --

19 THE COURT: Okay. You do not remember.

20 THE WITNESS: They're my collaterals. They are my  
21 marketing.

22 THE COURT: No, no.

23 THE WITNESS: I was requesting, if any, my own  
24 marketing collaterals. My lists, my marketing, what I built,  
25 Your Honor, myself, with my brand.



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1 THE COURT: The question is: Do you recall asking  
2 for this access?

3 THE WITNESS: I don't.

4 THE COURT: That is the question.

5 You do not.

6 THE WITNESS: I honestly do not.

7 THE COURT: Do you know what is in that folder  
8 marked marketing collaterals today?

9 THE WITNESS: Marketing collaterals, I believe, are  
10 a folder of like, the video that I created, all of the --  
11 the -- the verbiage that I used. All they did was slap a  
12 picture on everything.

13 THE COURT: For IME Companions?

14 THE WITNESS: Correct.

15 THE COURT: All right.

16 Mr. Kataev, unless you have anymore questions about  
17 this, we are going to take a break for lunch.

18 Q This marketing collaterals folder was at IME Legal Reps,  
19 correct?

20 A No. I was requesting my marketing. Not at IME Legal  
21 Reps. I was requesting it from Giant Partners. If -- if  
22 that. I don't even know what this is, honestly.

23 THE COURT: All right.

24 Let's, Mr. Kataev, she says she does not remember  
25 doing this.



1 MR. KATAEV: All right. Last question.

2 Q Isn't it true that the marketing collaterals Companions's  
3 had are the same ones that IME Legal Reps had?

4 A No, I don't believe that's true. I don't even -- I've  
5 never seen a marketing for Legal Reps.

6 Q How would you know?

7 A I haven't seen it. You see it all the time. They're all  
8 on -- you see them on Instagram, you see them on wherever you  
9 see them, wherever they market them.

10 I've seen Watchdog marketing. I've seen Guards's  
11 marketing. I've never seen an IME Legal Reps's marketing.

12 THE COURT: All right.

13 That is the last question before our break.

14 Everyone be ready to go at 1:00 o'clock.

15 Mr. Kataev, I mean I --

16 MR. KATAEV: I have less than one page left,  
17 Your Honor.

18 THE COURT: Okay. But that is your first witness.  
19 Remember the allotment, you have used up basically all of your  
20 time just on one witness.

21 Now, I will give you back a little time since I  
22 interrupted and asked some questions, but you have many more  
23 witnesses on your list.

24 MR. KATAEV: I will represent to the Court that the  
25 remaining witnesses are much shorter.



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1 THE COURT: All right.

2 1:00 o'clock, everyone. See you then.

3 Have a good lunch.

4 THE WITNESS: Your Honor, am I going to take the  
5 stand when I come back?

6 THE COURT: Yes.

7 MR. FELSEN: Your Honor, we would ask Ms. Gelardi be  
8 directed not to speak to Mr. Liddie about her testimony.

9 THE COURT: You can ask them if they did during the  
10 lunch break.

11 I am not going to preclude them from talking because  
12 they have been sitting here the whole time.

13 THE LAW CLERK: Judge, he said Mr. Liddie.

14 THE COURT: Oh, I am sorry. Mr. Liddie, I am sorry.  
15 I thought you said Mr. Gelardi.

16 Listen, there is no bar on witnesses talking to each  
17 other. It is just very, very bad idea, so I assume whoever is  
18 going to ask Mr. Liddie will ask right out of the box did the  
19 two of you talk about your testimony.

20 But I am not going to bar them from doing something  
21 that is obviously improvident or stupid. Let's put it that  
22 way.

23 ALL: Thank you, Your Honor.

24 (Continued on following page with AFTERNOON  
25 SESSION.)



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AFTERNOON SESSION

(In open court.)

(Judge PAMELA K. CHEN enters the courtroom.)

THE COURTROOM DEPUTY: All rise.

THE COURT: Have a seat everyone.

Let's go back on the record with thanks to our court reporter for surviving us.

Back on the stand.

(Witness resumes stand.)

THE COURT: Remember you are under oath, Ms. Gelardi.

You may resume, Mr. Kataev.

DIRECT EXAMINATION

BY MR. KATAEV: (Continuing)

Q Ms. Gelardi, during the lunch break, did you communicate with Mr. Liddie?

A No, I did not.

Q Okay.

I'd like to refer to your prior testimony about the credentials you provided for GoDaddy.

You testified that those credentials were for IME Companions, correct.

A I did not testify to that.

Q Those credentials were for IME Legal Reps, correct?

A I did not testify to that. I testified that Liddie



1 called me asking me for credentials and I gave them to him,  
2 and whatever he gave them, he gave them.

3 Q What were the credentials for?

4 A I don't -- I believe they were for -- look, that's my  
5 password.

6 Q Okay.

7 MR. KATAEV: I'm going to present for ID,  
8 Plaintiff's Exhibit 61.

9 (Exhibit published.)

10 THE COURT: Password to what?

11 MR. KATAEV: Well, that was the question.

12 THE COURT: No, I am asking the question of you.  
13 Password to what?

14 THE WITNESS: Since this, Your Honor, please forgive  
15 me, I truly -- I just want to apologize for being  
16 disrespectful to you, but that's been my password to almost  
17 everything after the case started.

18 THE COURT: I know, but in this e-mail you are  
19 giving a password.

20 What is it a password for?

21 THE WITNESS: So this is another password, user ID  
22 and password.

23 I don't know --

24 THE COURT: No, no, for an account? Just explain to  
25 me what it gives access to or what were you giving access to



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1 by providing the password, that is all I am asking.

2 THE WITNESS: I believe I was giving access to  
3 IME Companions.

4 THE COURT: IME Companions what?

5 THE WITNESS: The credentials to IME Companions  
6 to -- for the website to be switched over.

7 THE COURT: Okay.

8 So pardon my ignorance, but a password to an  
9 IME Companions's account?

10 THE WITNESS: Yeah.

11 THE COURT: E-mail account?

12 THE WITNESS: No, no, no, not to the e-mail account.  
13 To the domain account.

14 THE COURT: Okay.

15 The GoDaddy account.

16 THE WITNESS: Correct.

17 THE COURT: All right.

18 Go ahead.

19 BY MR. KATAEV:

20 Q So, you are you saying that this password from  
21 Exhibit 39, which I believe is in evidence, this user name and  
22 this password is for IME Companions.

23 That's your testimony.

24 A I believe so, yes.

25 Q I want to remind you you're under oath.



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1 A Yes.

2 THE COURT: Use the microphone.

3 MR. KATAEV: I'm going to present for ID what is  
4 marked as 61.

5 (Exhibit published.)

6 Q In this e-mail exchange there are credentials with your  
7 name and a password named Pupa, right?

8 THE COURT: P-U-P-A.

9 A Correct.

10 Q Pupa is a reference to one of your children, correct?

11 A Correct.

12 Q So it's your password, right?

13 A Correct.

14 Q Okay.

15 THE COURT: Hang on one second, let me look at this.

16 It is an e-mail from IMELegalReps@gmail.com and it  
17 says: See credentials. Has your name, first name, with a  
18 number and then your child's name with another number, and  
19 exclamation points; is that right?

20 THE WITNESS: That is correct, Your Honor.

21 THE COURT: And did you send that e-mail from the  
22 IME Legal Reps's Gmail account?

23 THE WITNESS: No, Your Honor.

24 THE COURT: So someone else has your credentials?

25 THE WITNESS: No, Your Honor.



1 THE COURT: So you did not create those credentials.

2 THE WITNESS: No, those are my credentials.

3 THE COURT: For what account?

4 THE WITNESS: For my IME Companions's GoDaddy  
5 account.

6 However, I was asked for my credentials by Eugene.  
7 And I gave it to him. So in order to enter.

8 So this was my first credentials, for the  
9 IME Companions. They weren't able to get in. I totally  
10 forgot that I changed them. And then I -- then they weren't  
11 able to get in, so then I had to give them, try these.

12 THE COURT: So is your testimony that the IME Legal  
13 Reps e-mail was sent by Eugene to you?

14 THE WITNESS: No, no, no.

15 THE COURT: Or by Eugene to Giant Partners.

16 THE WITNESS: Right.

17 THE COURT: Okay.

18 THE WITNESS: Eugene called me and asked me for the  
19 credentials.

20 THE COURT: I see.

21 THE WITNESS: So I gave it to him. And I think the  
22 first set of credentials didn't go through.

23 BY MR. KATAEV:

24 Q The first at the time of credentials is which one, this?

25 A Yes.



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1 Q Okay.

2 So you're saying that the password that you changed  
3 it to, with the derogatory reference to Ms. Levi, is the  
4 second password?

5 A Wait, wait, wait. I'm so sorry.

6 THE COURT: Why don't we look at the dates.

7 Could you show the other e-mail.

8 THE WITNESS: Yeah, because again, Your Honor, yeah,  
9 I believe -- I believe that is correct. I believe that is  
10 correct, or either vice versa. I don't remember which  
11 credentials worked but they were both credentials.

12 THE COURT: So the first e-mail we looked at is  
13 April 11, 2023, and the second one is April 25, 2023.

14 So it looks like the first credentials you sent with  
15 the Levi reference as the password did not work.

16 Is that your testimony?

17 THE WITNESS: I believe so.

18 THE COURT: Okay.

19 THE WITNESS: Because again --

20 THE COURT: No, that is all right. No further  
21 testimony.

22 Go ahead.

23 BY MR. KATAEV:

24 Q Okay.

25 The April 25th, 2023, e-mail references credentials



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1 for IME Companions, correct?

2 A They were both for IME Companions, Mr. Kataev.

3 Q So your testimony is that you changed the user name to  
4 IME Legal Reps at Gmail for Companions?

5 A For Companions? What do you mean?

6 Q You're saying that both of these sets of credentials are  
7 for Companions, correct?

8 A I believe that's what they were asking me for.

9 Q Okay.

10 But in this April 11th, e-mail --

11 THE COURT: So the April 11th e-mail says, do you  
12 understand, that the GoDaddy account is IMELegalReps@gmail.  
13 And you are saying that that was the IME Companions --

14 THE WITNESS: No, Your Honor. No, what I'm saying  
15 is Eugene had called me and asked me for my credentials. I  
16 gave him the credentials that I believed were my credentials.

17 Then I believe they didn't work, so he called me and  
18 said they didn't work. So then I gave him, you know, other  
19 credentials and then he emailed them.

20 I wasn't in communication with Giant Partners.

21 THE COURT: Let's stop for one second.

22 THE WITNESS: All right.

23 THE COURT: I just want to make sure I understand.

24 Looking at the April 11, 2023, e-mail --

25 THE WITNESS: Right.



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1 THE COURT: -- which is from IME Legal Reps's Gmail  
2 account, right?

3 THE WITNESS: Correct.

4 THE COURT: Okay.

5 It is to Corey Weissman and gives a GoDaddy account  
6 of IMELegalReps@gmail.com. Then backslash, and then it has a  
7 customer number. And then it has a password, which references  
8 Ms. Levi.

9 That GoDaddy account information is -- do you know  
10 which account that is for or which website that is for?

11 THE WITNESS: So that's my password and -- and that  
12 has nothing -- that was --

13 THE COURT: You are saying it was not for this IME  
14 Legal Reps?

15 THE WITNESS: No, it wasn't. That's my password.

16 THE COURT: But somebody else used your password?

17 THE WITNESS: No. No one else used my password,  
18 Your Honor.

19 THE COURT: Okay.

20 So who provided that password to Mr. -- or why do  
21 you, if you know, is it being sent by IME Legal Reps to Corey  
22 Weissman for that GoDaddy account --

23 THE WITNESS: Yes.

24 THE COURT: -- which is IME Legal Reps's account?

25 THE WITNESS: Again, Your Honor, I just gave Eugene



1 my password and he gave it to them, or he was confused, or he  
2 made an error in this e-mail. That's when -- I think you need  
3 to ask him because --

4 THE COURT: But hang on.

5 THE WITNESS: -- I gave him my credentials.

6 MR. KATAEV: Okay.

7 THE COURT: So your testimony is that if it somehow  
8 got associated with the IME Legal Reps's GoDaddy account, that  
9 is his error. That is what your testimony is.

10 THE WITNESS: My testimony is that that's my  
11 password and I -- I -- I highly doubt Gene would use that  
12 password. He might have sent them that e-mail so that they  
13 could get into the account to finish the migration and maybe  
14 confused the passwords, but that's my password.

15 THE COURT: All right. I understand your testimony.

16 Go ahead.

17 BY MR. KATAEV:

18 Q So just so I'm clear, this password is for Companions,  
19 that's your testimony?

20 A That was my new password for Companions, that's correct.

21 THE COURT: And so the record is clear, you are  
22 pointing to the Levi reference password.

23 THE WITNESS: Right. That is correct.

24 MR. KATAEV: From April 11th, Your Honor.

25 THE COURT: From April 11th.



1 THE WITNESS: Even the credentials on the first set  
2 that he mentioned, Your Honor, with the Safa1125, those were  
3 even wrong.

4 So, you know, again, there's a lot of errors in the  
5 emails. Those are not my credentials for -- for Companions  
6 either. The Safa1125 was wrong. It has the -- the -- the  
7 user ID is info@IMECompanions.com and the password was  
8 Pupa0507, right? Exclamation, exclamation.

9 I did change the password because often you have to  
10 change the passwords. I changed it to Levicunt password. And  
11 then when they weren't able to get into my GoDaddy account,  
12 Gene called me and said I need the credentials. I gave him my  
13 password.

14 THE COURT: All right. Let's go on.

15 MR. KATAEV: Okay.

16 BY MR. KATAEV:

17 Q In this e-mail from 61, there's an e-mail that says:  
18 Connor, you have to fix this. People are associating  
19 IME Companions to IME Legal Reps and that is a significant  
20 issue.

21 Do you see that?

22 A Yes.

23 Q Did you send this e-mail?

24 A I don't recall. No, I don't think I did.

25 Q Do you recall threatening Giant Partners to sue them if



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1 you lose clients because of this association?

2 A No, I do not.

3 Q It says in here that it looks like you will lose clients  
4 because of this association.

5 Do you know what was meant by that?

6 A I don't. Am I on this e-mail thread?

7 Q Right underneath it says: Hey, Safa -- so I'm  
8 assuming --

9 A Mr. Kataev, they said Hey, Safa on every single e-mail.  
10 That doesn't mean -- that -- I mean, just because they were  
11 confused and they made errors, that doesn't mean anything. I  
12 never responded to these emails --

13 THE WITNESS: Unless it was something from me to  
14 give, Your Honor.

15 THE COURT: All right.

16 Mr. Kataev, let's move on.

17 MR. KATAEV: Presenting for ID what's been marked --

18 THE COURT: You have to speak into the microphone.

19 MR. KATAEV: Presenting for ID what's been marked as  
20 67.

21 (Exhibit published.)

22 Q This is an e-mail exchange between you and Giant  
23 Partners, correct?

24 MR. WARNER: Objection to the use of the term  
25 exchange, Your Honor.



1 Q This is an e-mail you received from Giant Partners,  
2 correct?

3 A That's what it seems to me, yes, Mr. Kataev.

4 MR. KATAEV: I offer this into evidence as 67.

5 MR. WARNER: Objection.

6 THE COURT: Admitted. It actually is to her at her  
7 Gmail account.

8 (Plaintiff's Exhibit 67 received in evidence.)

9 MR. WARNER: Your Honor, it's an out-of-court  
10 statement being used to prove the truth of the statement.

11 THE COURT: I do not know what it is being used to  
12 prove other than there was some communication.

13 THE WITNESS: There was no communication.

14 THE COURT: Hang on.

15 THE WITNESS: I'm sorry.

16 THE COURT: I am going to admit it.

17 Let me see what Mr. Kataev asks her. At a minimum,  
18 it shows a conversation or a communication, I should say,  
19 between Mr. Weissman and Ms. Gelardi. That is a speaking act  
20 and for now I want to hear what the question is about it.

21 Q In this e-mail, Mr. Weissman asks you specifically  
22 whether you are still working with Eugene, correct?

23 MR. WARNER: Objection, Your Honor.

24 THE COURT: Overruled.

25 MR. WARNER: It speaks for itself. It is now in



1 evidence.

2 THE COURT: Overruled.

3 THE WITNESS: Okay. I --

4 THE COURT: Do you see that part of --

5 THE WITNESS: I do see that.

6 THE COURT: Ask your question, Mr. Kataev.

7 Q Based on this e-mail, isn't it true that you were working  
8 with Mr. Liddie at IME Legal Reps?

9 THE COURT: Okay. Sustained as to that question.

10 Is it true that as of February 9, 2024, you were  
11 working with Mr. Liddie at IME?

12 THE WITNESS: Your Honor, I never worked with Eugene  
13 in IME Legal Reps.

14 THE COURT: All right.

15 THE WITNESS: All I did was help him migrate the  
16 site over.

17 THE COURT: Okay. Answered.

18 Let's go on.

19 MR. KATAEV: Marking for ID 68.

20 (Exhibit published.)

21 Q This is another e-mail exchange between you and Giant  
22 Partners, correct. I'm sorry --

23 A It wasn't an exchange.

24 THE COURT: Yes, use a word --

25 Q This is an e-mail you received from Giant Partners,



1 correct?

2 A It seems that way, yes.

3 MR. KATAEV: I offer this into evidence as 68.

4 THE COURT: Admitted.

5 (Plaintiff's Exhibit 68 received in evidence.)

6 THE COURT: Over objection, I understand.

7 MR. WARNER: Your Honor, I have my same objection.

8 THE COURT: Yes. Same objection; overruled.

9 Q In this e-mail, Mr. Weissman asks you how business is  
10 going and if you ended up settling things with that lady,  
11 correct?

12 A That's what it says.

13 Q That lady refers to Daniella Levi, correct?

14 A I believe so.

15 Q This e-mail came about because of your direct discussions  
16 with Mr. Weissman about this case, correct?

17 A I told Mr. Weissman that there is a legal battle going  
18 on.

19 THE COURT: Did you tell him that in person or via  
20 e-mail?

21 THE WITNESS: No, no. Over the phone. I never met  
22 them, Your Honor.

23 THE COURT: But you spoke to him on the phone.

24 THE WITNESS: I spoke to him over the phone. I said  
25 I don't think -- that's when I had to cancel my marketing.



1 THE COURT: How many times did you speak with  
2 Mr. Weissman or anyone else from Giant Partners on the phone?

3 THE WITNESS: Your Honor, from the two-and-a-half  
4 years that I worked with them in campaigning for my company  
5 and migration, I'm going to overestimate just for the sake of  
6 not perjuring myself, a handful of times.

7 THE COURT: All right.

8 THE WITNESS: We never really spoke. I had to call  
9 them to tell them, hey, look, I'm having legal issues. I'm  
10 selling my website. I need you to help me move it over.

11 They -- they -- everyone expresses -- no one wants  
12 to loose business.

13 THE COURT: Hang on. Just so your testimony is  
14 clear.

15 You say you, at most, spoke to someone from Giant  
16 Partners a handful of times --

17 THE WITNESS: Correct.

18 THE COURT: -- during the entire course of your  
19 business dealings with them, correct?

20 THE WITNESS: Phone conversations.

21 THE COURT: Right.

22 THE WITNESS: Yes.

23 THE COURT: And are you saying you never met with  
24 them in person?

25 THE WITNESS: Never met with them in person.



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1 THE COURT: Okay.

2 And did you ever meet with them via Zoom or anything  
3 like that?

4 THE WITNESS: In -- in our -- in our initial on  
5 boarding call, I believe we did a Zoom to explain the business  
6 and -- and how we were going to -- the marketing strategy.

7 THE COURT: And is it your testimony that the  
8 purpose for you to work with Giant Partners was solely to help  
9 migrate the IME Companions's website to Mr. Liddie's IME Legal  
10 Reps's website.

11 THE WITNESS: I'm sorry, Your Honor, can you repeat  
12 that?

13 THE COURT: What was the purpose? What was the  
14 purpose for which you engaged with Giant Partners?

15 THE WITNESS: When?

16 THE COURT: Well, give me the arc of the whole  
17 business relationship.

18 THE WITNESS: Um --

19 THE COURT: Initially, what was the purpose?

20 THE WITNESS: Initially it was an on-boarding call.  
21 Then we did --

22 THE COURT: But why did you contact them?

23 THE WITNESS: Why did I contact them?

24 THE COURT: Yes, what was the purpose?

25 THE WITNESS: So they could start my marketing.



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1 THE COURT: For what company?

2 THE WITNESS: IME Companions.

3 THE COURT: And when did that happen?

4 THE WITNESS: In -- I want to say 2021?

5 THE COURT: Okay.

6 So 2021 you are working with --

7 THE WITNESS: 2020. Sorry.

8 THE COURT: Even during that time, you never met  
9 with them in person.

10 THE WITNESS: No, they're in Arizona, Your Honor.

11 THE COURT: Okay.

12 So then let's say after the March 2023 order is  
13 issued, you are still communicating with Giant Partners?

14 THE WITNESS: On the phone?

15 THE COURT: In any form.

16 THE WITNESS: Basically just to approve marketing or  
17 to write my slogans that they put the pictures on.

18 THE COURT: So marketing for IME Companions.

19 THE WITNESS: Correct.

20 THE COURT: Still, in March of 2023 and thereafter.

21 THE WITNESS: No, no. I believe I ended my  
22 partnership with Giant Partners in January of 2023,  
23 Your Honor.

24 THE COURT: Well, there are still some emails. This  
25 one is dated March of 2024. So you are still communicating



1 with them in March of 2024, right?

2 THE WITNESS: Wait. This is March of 2024? No,  
3 Your Honor, this is -- again, they're discussing incompetent  
4 error. March of 2024, this is this year.

5 THE COURT: This is. And it says: Have you worked  
6 out your issues with that lady.

7 It could be that you have had no communication  
8 before then.

9 THE WITNESS: No, I haven't. The last communication  
10 I had with Giant Partners was merely to migrate the site.

11 THE COURT: Well, that is my question.

12 THE WITNESS: That's the last -- that's the last  
13 communication.

14 THE COURT: And when was that?

15 THE WITNESS: On or around March or April, that  
16 whole time with the --

17 THE COURT: 2023.

18 THE WITNESS: 2023, correct.

19 THE COURT: Okay.

20 So your testimony is that your initial relationship  
21 with Giant Partners was connected to IME Companions for your  
22 marketing, right.

23 THE WITNESS: Correct, absolutely.

24 THE COURT: Okay.

25 And thereafter, given everything that has happened



1 in this case, your other reason for working with them or  
2 communicating with them, was to migrate your website,  
3 IME Companions to Mr. Liddie's website, IME Legal Reps.

4 THE WITNESS: Correct.

5 THE COURT: And those are the only purposes.

6 THE WITNESS: Absolutely.

7 THE COURT: All right.

8 THE WITNESS: And this, I -- I had never seen this  
9 e-mail, although it is addressed to me, so I'm not going to  
10 deny it, but I've never seen it. But prior to this, the last  
11 communication I had, even prior to the migration, when I  
12 called to cancel my marketing plan because we had a 12-month  
13 contract, I said I don't know where my business is going.

14 THE COURT: And did you reference a lawsuit and  
15 Ms. Levi?

16 THE WITNESS: I did.

17 THE COURT: And the reference, as far as you know to  
18 "the lady," is Ms. Levi.

19 THE WITNESS: I never called her that lady. I never  
20 called her anything nice, but I never called her "that lady."  
21 So that was them.

22 THE COURT: Somehow "that lady" is not worse than  
23 what you have called her.

24 But looking at that e-mail for a moment, though, do  
25 you remember receiving this e-mail?



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1 THE WITNESS: I don't. That's the thing.

2 THE COURT: Okay.

3 THE WITNESS: I know it's addressed to me but I  
4 don't recall seeing this, Your Honor.

5 THE COURT: Okay. All right.

6 So Mr. Kataev, I apologize to you, but I am just  
7 trying to get to the bottom of some of this testimony. I  
8 realize you are not necessarily interested in all of these  
9 answers, but I assume Mr. Warner would bring this up. I just  
10 want a more linear picture, a chronological picture of what  
11 her relationship was with Giant Partners.

12 Okay.

13 MR. KATAEV: Yes, Your Honor. I appreciate it.

14 BY MR. KATAEV:

15 Q In this e-mail exchange, Liddie would not be someone who  
16 would discuss a lawsuit because he is not a party to the  
17 lawsuit, correct?

18 MR. WARNER: Objection, Your Honor. As to what  
19 Mr. Liddie would or wouldn't do.

20 THE COURT: Sustained. Save it for argument.

21 Q You did this work to migrate IME Legal Reps with what you  
22 had before at IME Companions for the \$4,300; is that right?

23 A It wasn't a lot of work, Mr. Kataev. I just had to  
24 explain to them that, hey, look, I'm -- I'm -- I'm not going  
25 to be doing business with you guys anymore. I need this site



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1 migrated. It is in the benefit of me and Liddie to get this  
2 done ASAP because he's trying to start his business, and I  
3 need to walk away from my business temporarily, in my head  
4 temporarily -- allow me to finish, please.

5 I needed to walk away from my business temporarily  
6 because I didn't know where it was going. I didn't know  
7 whether I was going to be shut down. I didn't know whether I  
8 was going to continue working. So I had to call them. I had  
9 to explain to them what was going on, hey, look, I'm going to  
10 sell my website for now. I'm going to end my marketing for  
11 now. I'm going to give you -- hey, maybe you guys can sell  
12 Eugene Liddie on marketing, but for now, we just need you to  
13 help us migrate the site.

14 I did what I could and -- and then I never contacted  
15 them or was in ever contact with them after that.

16 THE COURT: Let's move on.

17 Go ahead.

18 BY MR. KATAEV:

19 Q You participated in virtual meetings with Giant Partners,  
20 correct?

21 A No. Like I said, to the -- the Honorable Judge, I only  
22 did one Zoom meeting initially, initially, when I had to  
23 introduce IME Companions's services because they didn't  
24 understand the business.

25 MR. KATAEV: Presenting for ID what's been marked as



1 69.

2 (Exhibit published.)

3 MR. KATAEV: This is a virtual meeting invitation  
4 between Giant Partners and IME Legal Reps.

5 Q Correct?

6 A That's what it looks like, Mr. Kataev.

7 Q And you accepted this meeting, correct?

8 A I never got this meeting, Mr. Kataev. Was this sent to  
9 me?

10 Q Did you -- do you deny joining -- attending --

11 A I totally deny entering this meeting, joining any  
12 meeting. I have not been in contact, for the tenth time, with  
13 Giant Partners since the end of the migration.

14 Q You were not present with Mr. Liddie at this March 21st,  
15 2024, meeting?

16 A I was never in this meeting. I never heard of this  
17 meeting. I was not aware of this meeting.

18 THE COURT: Mr. Kataev, I am going to remind you of  
19 the time because you have two other witnesses on your list --

20 MR. KATAEV: This is my last exhibit.

21 THE COURT: -- at least.

22 Q When you worked with Giant Partners, you had access to  
23 something called the HubSpot dashboard, correct?

24 A That is correct.

25 (Exhibit published.)



1 MR. KATAEV: I'm going to represent to you that this  
2 is a screenshot from the HubSpot dashboard received from Giant  
3 Partners in response to a subpoena.

4 MR. WARNER: What number is this, Mr. Kataev?

5 MR. KATAEV: 71 for ID.

6 THE WITNESS: Honestly, I can't see a thing. It's  
7 too small. If you could maybe expand it. Or maybe I could  
8 look at -- what page?

9 Q First page is 71.

10 A Okay. No, this is fine. If you could just get it  
11 clearer. Okay.

12 Q In the HubSpot dashboard, you're listed as a partner in  
13 IME Companions, correct?

14 A I'm listed as a partner in IME Companions?

15 Q That's what it says on here, correct?

16 A Where does it say that?

17 Q Here. Partner in IME Companions; is that right?

18 A Yes.

19 Q Okay.

20 And you had access -- you still had access to this  
21 HubSpot with Giant Partners, correct?

22 A I did not have access to this HubSpot.

23 Q When you paid for services with Giant Partners, they gave  
24 you access to HubSpot, correct?

25 A So I'm going to explain to you what HubSpot is. I'm sure



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1 you already know.

2 Q Did you or did you not have access --

3 A I did have access.

4 Q That's all I'm asking.

5 A Wonderful, that's fine. I had access.

6 Q On the top right of this exhibit, the IME Companions's  
7 website and phone number is listed, correct?

8 A What? What date is this? Because this is wrong.

9 Q Is this the phone number for IME Companions listed there  
10 or not?

11 A That is not IME Companions's phone number. No, it is  
12 not.

13 Q Okay.

14 And these exchanges are as early as March of 2024,  
15 correct?

16 THE WITNESS: Your Honor --

17 Q Yes or no?

18 A No, no, no. It's not because this is brand new to me.

19 THE WITNESS: Your Honor, HubSpot was -- I want to  
20 tell you because he's not allowing me to explain it.

21 THE COURT: You know what? Your lawyer can have you  
22 explain it.

23 The question is: Have you seen this document  
24 before?

25 THE WITNESS: I have not.



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1 THE COURT: All right.

2 Let's move on, Mr. Kataev, because this witness is  
3 not going to be able to testify about it.

4 THE WITNESS: No, no, I will testify about it.

5 THE COURT: No, no, no. But I do not -- no, but you  
6 cannot. You said you have never seen it before.

7 THE WITNESS: I never seen this document.

8 THE COURT: All right.

9 So Mr. Kataev --

10 Q You're listed as a recipient of these exchanges, correct?

11 MR. WARNER: Objection to what the document says.  
12 It's not in evidence and shouldn't be in evidence through this  
13 witness, Your Honor.

14 THE COURT: Overruled.

15 If she received it, that is a different story. I --  
16 actually, it does say Safa Gelardi.

17 Do you recall receiving this communication from  
18 Mr. Weissman on or in March of 2024?

19 THE WITNESS: No, Your Honor.

20 And HubSpot is -- is -- is just an extra platform  
21 that I'm going to explain it to you because they're trying to  
22 mislead you.

23 HubSpot is a platform that Giant Partners created  
24 for me for the leads of my marketing to go into, right? So  
25 as -- as I'm marketing, with my marketing, there's another



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1 platform called HubSpot, where if someone leaves a message or  
2 tell me about your rates or whatever, or I'm interested, or  
3 how much do you charge, it goes into a platform called  
4 HubSpot.

5 THE COURT: But can you communicate through HubSpot?

6 THE WITNESS: No, Your Honor. I stopped my  
7 marketing --

8 THE COURT: No, no.

9 THE WITNESS: -- in January of 2023.

10 THE COURT: No. No, no. Stop.

11 THE WITNESS: I no longer had access to HubSpot.

12 THE COURT: Okay.

13 So you are saying as of the date of this  
14 communication, you did not have access to the HubSpot.

15 THE WITNESS: I did not have access -- no, I did  
16 not, since I ended my marketing contract with Giant Partners.

17 THE COURT: Which was when?

18 THE WITNESS: I want to say -- I want to say  
19 January or February of 2023.

20 THE COURT: Of 2023.

21 THE WITNESS: 2023, correct.

22 THE COURT: All right.

23 THE WITNESS: I had not.

24 THE COURT: That is your testimony.

25 Let's go on. We really need to move.



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1 BY MR. KATAEV:

2 Q Ms. Gelardi, in this exchange, Giant Partners asks for a  
3 call with --

4 THE COURT: Mr. Kataev, stop, stop, stop.

5 She just said she does not know. She did not see  
6 this. You can make whatever argument you want about it, but  
7 at this point I am not going to admit it.

8 Q Okay.

9 THE COURT: You can find Mr. Weissman or somebody  
10 else to try to authenticate it.

11 MR. KATAEV: Okay.

12 Q You are married to Mr. Vito Gelardi, correct?

13 A Yes.

14 Q You file joint tax returns with him, right?

15 A I do.

16 Q And IME Companions LLC is owned half by you and half by  
17 him, correct?

18 A Well, we're partners in life, so we're partners in  
19 business. We thought that would be the right thing to do.

20 Q Is Mr. Gelardi a 50 percent owner of IME Companions; yes  
21 or no?

22 A Yes.

23 Q He's also the CFO of IME Companions, correct?

24 A He has a title, just like Carlos had a title.

25 THE COURT: Is his title CFO?



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1 THE WITNESS: Yes.

2 THE COURT: All right.

3 Let's go on.

4 Q Did you and Vito participated in the decision to go into  
5 the IME observer industry together, correct?

6 A I don't -- no, that is not correct. Actually, I don't  
7 think Vito was interested in that IME business at all.

8 Q When you first met with Adam Rosenblatt before you formed  
9 IME Companions, Vito came with you to that meeting, correct?

10 A Mrs. Levi's husband is here with her for moral support,  
11 so Vito comes with me for moral support when I want to do  
12 something.

13 Q He came with you to the meeting, right?

14 A Correct.

15 Q And Vito also assisted you with finding a service for IME  
16 Companions, correct?

17 A Yeah, when I needed help and, you know, I asked him if he  
18 knew anyone who spoke Spanish, who -- yes. He would -- he  
19 would help me, assist me in very, very minor things, but he  
20 wasn't involved in the business.

21 Q You were still serving and marketing to customers on the  
22 joint customers list, correct?

23 A When?

24 THE COURT: You are saying now?

25 MR. KATAEV: Presently.



1 THE WITNESS: No.

2 Q You were still benefitting from the use of the IME  
3 Watchdog 2017 list, correct?

4 A Stop it. No.

5 THE WITNESS: I have no clients, Your Honor.

6 MR. KATAEV: I believe I'm done, but I want to check  
7 with my client.

8 THE COURT: All right.

9 (Pause in the proceedings.)

10 MR. KATAEV: I have no further questions.

11 THE COURT: All right.

12 Mr. Warner, your witness.

13 MR. WARNER: Thank you, Your Honor.

14 CROSS EXAMINATION

15 BY MR. WARNER:

16 Q Ms. Gelardi, did you fail to pay the final invoices that  
17 were received from BRG?

18 THE COURT: Use the microphone.

19 Q Ms. Gelardi, did you fail to pay the final invoices that  
20 were received from BRG starting in or about January of 2023?

21 A Yes.

22 Q And in January of 2023, did you make your last payment to  
23 Giant?

24 A Yes, I believe so.

25 Q Okay.



1           What was owed to you, according to BRG, in  
2 January of 2023?

3       A     From my recollection, I was under the impression that I  
4 owed maybe a thousand dollars.

5       Q     And after that, when much -- several more bills came in,  
6 you didn't pay them, correct?

7       A     No, I did not.

8       Q     Why is that?

9       A     Because I'm broke.

10      Q     Well, can you tell the Court exactly what you mean when  
11 you say broke?

12      A     Because I'm broke. I don't have any money in my bank  
13 account. My credit cards are maxed out. I borrow from people  
14 just to stay afloat. I plan on paying everyone back. I will  
15 get back together. I will start a new business. I will sell  
16 the house. And I will get everything paid, but as of now, I  
17 don't have any money.

18           MR. WARNER: I have no further questions,  
19 Your Honor.

20           THE COURT: All right. Thank you.

21           MR. KATAEV: Quick redirect. I'll do it from here.

22           THE COURT: Yes.

23 REDIRECT EXAMINATION

24 BY MR. KATAEV:

25       Q     Ms. Gelardi, you don't offer any evidence of your



1 financials to support your contentions that you're broke,  
2 correct?

3 MR. WARNER: Objection, Your Honor.

4 THE COURT: Sustained.

5 But why don't we do it differently.

6 Do you have any evidence to show that actually are  
7 broke, as you say, and for how long you have been broke?

8 THE WITNESS: I can show them to you, Your Honor.

9 THE COURT: Well, would you have bank records, for  
10 example?

11 THE WITNESS: Absolutely. I can show them to you,  
12 but I do not want to show them to the defense because every  
13 time they have something of my personal information, they  
14 abuse it.

15 THE COURT: All right.

16 But you are going to have to turn it over to them,  
17 as well as to me --

18 THE WITNESS: And I --

19 THE COURT: Hang on.

20 -- if you are claiming as a defense that you have no  
21 money to pay.

22 THE WITNESS: I have no money and I can prove it to  
23 you.

24 THE COURT: All right.

25 I would like -- you are still going to have to turn



1 it over to --

2 THE WITNESS: I will not turn my information over to  
3 them, Your Honor.

4 MR. KATAEV: Deal with it post-hearing, Your Honor.

5 THE COURT: All right. Let's deal with that later.

6 MR. KATAEV: No further questions.

7 THE COURT: That is fine.

8 Here is the problem we have. It is 1:30. I said  
9 this was going until 2:00. You have used up more than your  
10 share of time, Mr. Kataev.

11 I will let Mr. Warner call the two other witnesses I  
12 actually want to hear from as well, Mr. Liddie, and  
13 Mr. Gelardi. They are on your list.

14 MR. WARNER: Yes, they are, Judge.

15 THE COURT: So call them as witnesses. You can step  
16 down.

17 (Witness excused.)

18 MR. WARNER: My cross-examination -- my examination  
19 of Mr. Vito Gelardi will be very, very brief, Your Honor.

20 THE COURT: That is fine. You are not going to lead  
21 him, though.

22 MR. WARNER: Yes, I meant examination.

23 THE COURT: Mr. Gelardi, please take the stand and  
24 remain standing for a moment so you can be sworn in.

25 MR. KATAEV: Your Honor, would it be possible to go



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1 with Liddie next? Because we want that testimony over  
2 Mr. Gelardi.

3 THE COURT: Well, quite honestly, you should have  
4 thought of that when you were using up two plus hours  
5 examining the first witness. But we will go with Mr. Liddie,  
6 we will run longer than 2:00 because it is important for us to  
7 hear from Mr. Liddie who I gather may have -- I do not know  
8 where he lives now, but maybe he traveled to get here.

9 So let's hear from Mr. Gelardi first.

10 THE COURTROOM DEPUTY: Please raise your right hand.

11 **VITO GELARDI,**

12 called as a witness having been  
13 first duly sworn, was examined and testified  
14 as follows:

15 THE WITNESS: I do.

16 THE COURTROOM DEPUTY: Thank you. Have a seat.  
17 Please state and spell your name for the record.

18 THE WITNESS: Vito Gelardi -- V-I-T-O,  
19 G-E-L-A-R-D-I.

20 **DIRECT EXAMINATION**

21 **BY MR. WARNER:**

22 THE COURT: All right.

23 You may inquire, Mr. Warner.

24 MR. WARNER: Thank you, Your Honor.

25 Q Mr. Gelardi, did you have anything to do with the hiring



1 of the private investigator that attempted to contact Mr. Roa?

2 A No.

3 Q Were you aware that the hiring of the private  
4 investigator?

5 A No, I was not.

6 Q Mr. Gelardi, did you have anything to do with the  
7 transfer of any business from IME Companions to Client Exams  
8 Services?

9 A No.

10 Q And were you aware of any transfer to Client Exams  
11 Services in or about March or April of 2023?

12 A No.

13 MR. WARNER: I have no further questions, Judge.

14 THE COURT: All right.

15 CROSS EXAMINATION

16 BY MR. KATAEV:

17 Q Mr. Gelardi, you are the CFO of IME Companions, correct?

18 A Yes.

19 Q And as the CFO, you made financial decisions for  
20 IME Companions, correct?

21 A Yes.

22 Q You are an equal decision-maker at IME Companions; is  
23 that right?

24 A No.

25 Q In 2017 you made the decision not to hire Adam



1 Rosenblatt, correct?

2 A Not really, no.

3 Q In 2022, before this lawsuit, you were involved in active  
4 discussions with Mr. Rosenblatt to hire him together with  
5 Safa, correct?

6 A No.

7 Q Do you recall being present for the April 4th, 2022  
8 hearing? The first hearing in this case?

9 A Yes.

10 Q And do you recall that an audio recording was presented  
11 of a conversation you had with Mr. Rosenblatt?

12 A Yes.

13 Q You were involved in that conversation with  
14 Mr. Rosenblatt about him leaving IME WatchDog and coming to  
15 Companions, correct?

16 A No.

17 THE COURT: Mr. Gelardi, let me remind you that I  
18 was at the hearing also, and I heard that tape.

19 THE WITNESS: Can you repeat the question? I might  
20 have heard wrong.

21 Q Right before the lawsuit was filed, you were in active  
22 discussions with Mr. Rosenblatt to hire him at  
23 IME Companions, right?

24 A No.

25 Q Adam Rosenblatt called you --



1 A Okay. Can I explain?

2 This is how I heard the question. You said I was in  
3 active communications to hire him.

4 I walked in, to the office, and Adam called my wife  
5 and is harassing, and I wanted him off the phone to her, and  
6 he didn't want to stop harassing her.

7 So I got on the phone and I just -- I told him, no,  
8 we cannot give you no money. No, okay. Yeah, if you leave,  
9 we'll hire -- we'll give you a sign-on bonus.

10 And do you take everything everybody says literally?  
11 I cannot stand the guy.

12 Q Adam --

13 A His father -- his father begged me for him so many times.

14 Q Adam --

15 A I -- I picked him up when he was drugged out.

16 Q Adam --

17 A And just like his father, his son is a beggar and begged  
18 me for money.

19 Q Adam --

20 A If I gave him any money, it was for cigarette habit and  
21 other habits these guys have --

22 Q Adam Rosenblatt asked you for --

23 A -- so the discussion was not to hire him. The discussion  
24 was to get him off the phone.

25 Q Adam Rosenblatt --



1 A I never wanted to hire him. The discussion was not to  
2 hire him.

3 THE COURT: Okay.

4 A You didn't call me. And I did have a discussion with  
5 him. It was -- I had not one ounce of my mind that I wanted  
6 to hire him.

7 THE COURT: Mr. Gelardi --

8 A Not one bit.

9 THE COURT: -- two things.

10 Keep your voice down. And your answer is  
11 sufficient.

12 Let's go to the next question.

13 Q Adam Rosenblatt asked you for \$15,000 that day, correct?

14 A Correct.

15 Q And you only offered 2500, correct?

16 A I didn't offer him anything. I would never pay him  
17 anything. I wanted him off the phone. I told him a signing  
18 bonus, because I know he has no backbone and he would never  
19 leave, because he's under the grip -- grips of someone else.

20 THE COURT: Next question.

21 Q You made the decision to offer him whatever money he was  
22 offered that day, correct?

23 A I made the decision to take the phone and yes him and get  
24 him off the phone. That's what I made the decision. Because  
25 I was tired of this bullshit.



1 THE COURT: Mr. Roa, is it your testimony that  
2 before that phone call --

3 THE WITNESS: Gelardi. Mr. Gelardi.

4 THE COURT: Gelardi, I am sorry.

5 Before that phone call, the audio of which I have  
6 listened to and was played here in court, you were not  
7 involved in paying Mr. Rosenblatt to take information from IME  
8 Watchdogs?

9 THE WITNESS: I would never agree and would never  
10 pay anybody for anything. I never agree because I owned 20  
11 homes. I owned 20 houses in my life.

12 THE COURT: I am sorry. What does that have to do  
13 with that?

14 THE WITNESS: What I'm saying is, because they're  
15 assuming all this stuff and you know what? Safa -- all Safa's  
16 50 percent ownership of all my properties. She never lift a  
17 piece of wood, never put a screw in, I did. That's why my  
18 hands look like this.

19 THE COURT: How many properties do you own now?

20 THE WITNESS: I sold my two properties that had any  
21 equity in it.

22 THE COURT: How many properties do you own now?

23 THE WITNESS: Three.

24 THE COURT: Okay.

25 And where are they located? What states?



1 THE WITNESS: Two in Pennsylvania and one in Texas.

2 And I tried to sell the -- I'm trying to sell still,  
3 it's four. Still trying to sell one of my properties in  
4 New York. I own four. I'm sorry.

5 THE COURT: So it is your testimony that while you  
6 had 20 at some point in your life, you now have only four. Is  
7 that your testimony?

8 THE WITNESS: I started buying property at 19. I'm  
9 45 years old.

10 THE COURT: And your --

11 THE WITNESS: All the equity -- I never asked my --  
12 my partner, my wife. I always put 50 percent. That's why  
13 we're 50/50. She never had any involvement in the real  
14 estate.

15 THE COURT: Can I ask --

16 THE WITNESS: I don't understand the question. Why  
17 is he asking that?

18 THE COURT: Well, it is important to me.

19 So let me ask you a question. You are the CFO of  
20 the IME Companions company or you were. It would be up to you  
21 then to approve expenditures, would it not?

22 THE WITNESS: No.

23 THE COURT: So the money that was spent for the  
24 investigator who attempted to talk to Mr. Roa, were you  
25 unaware of that expenditure?



1 THE WITNESS: You mean Adam Rosenblatt?

2 THE COURT: No.

3 You were attempting to contact -- well, at least  
4 your wife hired an investigator to try to contact Mr. Roa,  
5 okay?

6 THE WITNESS: No, I'm not aware of anything she does  
7 and I don't want to be because I have my own stuff.

8 THE COURT: But you just testified that you are the  
9 CFO or were the CFO of IME Companions and were in charge of  
10 the finances for the company.

11 Were you also in charge of the expenditures? For  
12 example, the money paid to the investigator?

13 THE WITNESS: No. I trust my wife. I -- not going  
14 to ask about anything she spends. She don't ask me what I  
15 spend on the homes and I don't ask her what she spends on her  
16 ventures.

17 I don't -- I don't approve them. I don't -- I don't  
18 do anything. She doesn't approve my expenditures. I don't  
19 approve hers.

20 THE COURT: But you do not think you are partners in  
21 life and partners in business?

22 THE WITNESS: I'm not involved with the IME  
23 business. I've known Carlos since he was 16. I know  
24 Mr. Carlo Roa since he was 16.

25 THE COURT: Sir, that is not the question.



1           The question is you are the CFO of the company,  
2 correct?

3           THE WITNESS: Correct.

4           THE COURT: And you are 50 percent owner of the  
5 company, correct?

6           THE WITNESS: Correct.

7           THE COURT: And your wife at least characterized you  
8 as being partners in life and business.

9           Is that not correct?

10          THE WITNESS: Correct.

11          THE COURT: Okay.

12          So yet you are claiming that you do not know  
13 anything that happens with IME Companions?

14          THE WITNESS: 100 percent. I don't get involved  
15 with the decisions. She's a grown woman. She can make her  
16 decisions.

17          THE COURT: So she can spend whatever monies --

18          THE WITNESS: Yes. If there is money in the  
19 account, the budget is 50,000, use it.

20          THE COURT: Go ahead, Mr. Kataev.

21          MR. KATAEV: I'm going to play the recording. It's  
22 an exhibit from the first hearing in this case, marked as  
23 Plaintiff's Exhibit 18A.

24          THE COURT: You are just going to play it through  
25 the mic.



1 (Audio played.)

2 (Audio ends.)

3 BY MR. KATAEV:

4 Q Based on this recording, you were discussing with Adam  
5 the fact that there's a lot of expenses involved in  
6 IME Companions, which you were a part of, correct?

7 A Correct, because I tried to get him off the phone. I'm  
8 making a bunch of stuff up because he's a liar and that's how  
9 you talk to liars. You lie to liars.

10 I had no intentions of hiring him. I had all  
11 intentions of getting him off the phone. And, obviously, when  
12 the -- the hot mic that was on, where you're -- whoever your  
13 investigator or your -- you guys allowed to hire these private  
14 investigators, we're not -- but the guy said you guys got  
15 nothing with this recording. I told you, there's nothing  
16 there.

17 Q You were involved --

18 A Whatever I said is to pacify him to get out -- I had no  
19 intentions to pay him anything. I had no intentions. At that  
20 time -- at the time, I did have plenty of money. I had plenty  
21 of money at the time, trust me.

22 Q When -- you were involved in other decisions related to  
23 IME Companions, correct?

24 A Negative.

25 Q For example, when there was a decision made to make a



1 website for Companions, you were involved in that.

2 A No.

3 MR. KATAEV: I represent to you the deposition  
4 transcript of Ms. Gelardi dated February 3rd, 2013.

5 (Exhibit published.)

6 MR. KATAEV: February 3rd, 2023.

7 THE COURT: Mr. Kataev, let's have a side-bar with  
8 Mr. Warner.

9 (Side-bar conference held on the record out of the  
10 hearing of the courtroom.)

11 (Side-bar.)

12 THE COURT: I am only doing this because I do not  
13 want the witness to hear.

14 This is not a proper use of someone else's  
15 deposition. Are you going to cross-examine him about what his  
16 wife said?

17 MR. KATAEV: She was present at the deposition,  
18 Your Honor.

19 THE COURT: That does not matter.

20 The point is that is her testimony, so you should  
21 have asked her the question. Then you should have argued the  
22 point through her mouth.

23 MR. KATAEV: Okay.

24 THE COURT: But you cannot ask him about what she  
25 said.



1 MR. KATAEV: All right.

2 I'll move on.

3 (Side-bar end.)

4 (In open court.)

5 MR. KATAEV: I'd like to present to you what's been  
6 marked for ID as 33.

7 (Exhibit published.)

8 MR. KATAEV: I'm sorry. Marked for ID as 85.

9 (Exhibit published.)

10 BY MR. KATAEV:

11 Q This is an e-mail exchange between you, your wife, and a  
12 gentlemen named Karl Schuff, correct?

13 A I don't know who Karl Schuff is.

14 Q Mr. --

15 A My e-mail -- yeah, I don't check my e-mail. I can't even  
16 read this. I can't read it. I can't -- my eyes are not good  
17 and -- I honestly, I can't read it.

18 THE COURT: Well, there is a paper copy in front of  
19 you if you want.

20 Is there not?

21 MR. ROA: Yeah, there is.

22 MR. KATAEV: 85, Binder 3.

23 MR. ROA: Binder 3.

24 THE COURT: It is here. Big letters.

25 THE WITNESS: 95 or 85?



1 MR. KATAEV: 85.

2 THE WITNESS: Is this a tax return? This one?

3 MR. KATAEV: 85.

4 Permission to approach, Your Honor.

5 THE WITNESS: Is this 85?

6 THE COURT: Yes, the one that has a sticker that  
7 says 85.

8 THE WITNESS: Right here?

9 THE COURT: No, that is 84.

10 THE WITNESS: That's 84?

11 THE COURT: Yes.

12 Look at this sticker.

13 MR. KATAEV: There you go, right there.

14 THE COURT: See this sticker?

15 THE WITNESS: Yes.

16 THE COURT: Okay.

17 THE WITNESS: Okay. So that's my e-mail. This is  
18 my e-mail.

19 BY MR. KATAEV:

20 Q You're copied on that e-mail, correct?

21 A Okay. Yes.

22 MR. KATAEV: I offer into evidence 85.

23 MR. WARNER: Objection, Your Honor.

24 THE COURT: Overruled.

25 Q In this e-mail exchange there's a discussion about making



1 a website for IME Companions, correct?

2 A You're saying I wrote this e-mail?

3 Q I'm saying in this e-mail there's a discussion about  
4 making a website for IME Companions, correct?

5 A The name IME WatchDogs... that's what it seems like,  
6 yeah.

7 Q And you were copied on this e-mail because you're  
8 involved in the decision-making process at IME Companions,  
9 correct?

10 A I think I was copied on this e-mail to make me feel  
11 special, maybe.

12 Q Okay.

13 MR. KATAEV: I'm going to place up what's been  
14 marked for ID --

15 MR. WARNER: Note my objection because the e-mail is  
16 being offered for the truth of what is contained in it.

17 THE COURT: No.

18 Again, it is being offered to show that he had some  
19 knowledge of some plan. Whether the website got built or not  
20 is not relevant, or whether or not Ms. Gelardi actually wanted  
21 it to be built, is not what it is being offered for. It is  
22 just to show that he had knowledge of some business dealings,  
23 to disprove his claim that he was not involved in the  
24 day-to-day running of the business.

25 So it is just the act of him being included on an



1 e-mail that is relevant, but not the truth of what is said in  
2 the e-mail.

3 MR. KATAEV: Presenting for ID what's been marked as  
4 52.

5 (Exhibit published.)

6 Q This is the website sales agreement that you entered into  
7 with Mr. Liddie, correct?

8 A I don't see website -- I guess, yeah, yeah, yeah.

9 Q And it says your name as being a party to this agreement  
10 right here, right?

11 A Okay. Yes.

12 Q And, in fact, you signed, right?

13 A Yes.

14 Q So you were involved in the decision to sell the website  
15 as well, correct?

16 A Yes.

17 Q Okay.

18 MR. KATAEV: Then placing up for ID what's been  
19 marked as 86.

20 (Exhibit published.)

21 Q This is an October 18th, 2017, e-mail from Ms. Gelardi to  
22 you, correct?

23 A Oh, yes.

24 MR. KATAEV: I offer this into evidence as 86.

25 THE COURT: Admitted.



1 (Plaintiff's Exhibit 86 received in evidence.)

2 Q And in that e-mail exchange, Ms. Gelardi is discussing  
3 with you the contents of an IME observers report, correct?

4 THE COURT: You can read it. It says: Check out  
5 Moe's report, it was good.

6 That was the message from your wife to you, correct.

7 THE WITNESS: Correct.

8 THE COURT: All right.

9 Q You were involved at that time, at least, in hiring  
10 observers and determining whether they were good or bad,  
11 correct?

12 A I know a lot of people. I referred everybody, including  
13 Roa. I referred --

14 Q Were you involved; yes or no?

15 A This must be -- I don't remember. This must be somebody  
16 I referred to him and she told me, oh, he did the report. I'm  
17 glad because the people I refer usually contractors and  
18 they're no good.

19 So, I guess, I -- I -- I don't remember seeing it.  
20 I guess. I was there, so.

21 Q Okay.

22 You were also involved in other business venture  
23 ideas with Ms. Gelardi, correct?

24 A Everything's 50/50. It's my wife.

25 Q Okay.



1           And generally speaking, you work side-by-side with  
2 your wife, correct?

3       A     Literally, not physically. She doesn't come out to  
4 Pennsylvania while we renovate homes when I bought them or  
5 Philadelphia or Florida or anywhere.

6       Q     But you do whatever's necessary to help --

7       A     To be clear --

8       Q     But you do whatever is necessary to help her in her  
9 business, correct?

10      A     Not whatever's necessary.

11      Q     Isn't it true that, if necessary, you also attended and  
12 observed IMEs on behalf of Ms. Gelardi?

13      A     If I'm home doing nothing and there's a last minute, yes,  
14 correct, but if she had to beg me and there was nobody there,  
15 yes.

16      Q     You're also responsible for managing all aspects of the  
17 real estate investments you and Safa made, correct?

18      A     Correct.

19      Q     You decide what to buy, what to sell, when to sell and  
20 the like?

21      A     Correct.

22      Q     And generally speaking, you made no real estate  
23 investments until after Companions was formed, correct?

24      A     No. I been buying homes since I was 19.

25      Q     Prior to starting Companions, the only property you owned



1 was your residence, correct?

2 A Negative. I been buying homes since I was 19.

3 Q You purchased 1523 North Hollywood Street in Pennsylvania  
4 in November of '18, correct?

5 A Correct.

6 Q That was after a full year of operating Companions, yes?

7 A The date, correct. Yes.

8 Q And you purchased that property for \$81,000, all cash, no  
9 mortgage, correct?

10 A Negative.

11 Q Your testimony is there was a mortgage on that property?

12 A No, incorrect.

13 Q How much did you buy the property for?

14 A I bought it for 137,000, and I got a hard-money loan, and  
15 that's what paid for it. And that hard-money loan, it work as  
16 you finish a project, they come inspect it, and they give you  
17 a little bit more.

18 Q No traditional mortgage, correct?

19 A Not with that one. That was my first and last hard-money  
20 loan.

21 Q And VMS Holdings was the entity used to own that  
22 property, correct?

23 A Correct.

24 Q And that's a company you own jointly with Safa, 50/50,  
25 correct?



1 A Correct.

2 Q And that entity was set up as a holding company for this  
3 property, correct?

4 A Correct.

5 Q And you sold that property in December of '23, correct?

6 A Correct.

7 Q It was sold for \$229,000, right?

8 A Correct.

9 Q And you profited 148,000 from that property?

10 A That property negative 90,000. I put 300 on it and I had  
11 to sell it so I could pay my attorney some bills, and  
12 everybody else I owe money. I had negative profit.

13 Q You also purchased 9 Woods End in Lake Harmony,  
14 Pennsylvania, correct?

15 A Correct.

16 Q That property was purchased in July of '21, right?

17 A I believe so.

18 Q And you purchased it for \$315,000, correct?

19 A Correct.

20 Q You placed that property for sale in April of '23,  
21 correct?

22 A Correct.

23 Q And that was immediately after the expanded preliminary  
24 injunction, right?

25 A Correct.



1 Q However, in March of '24, you removed the listing to sell  
2 it, right?

3 A Correct.

4 Q And that removal of the listing was done after this Court  
5 scheduled a fourth hearing in this case for today, correct?

6 A Not necessarily why, but I'm not sure.

7 Q In January of '21 you purchased 148 Clay Pit Road on  
8 Staten Island, correct?

9 A Correct.

10 Q You bought that property for almost a million dollars,  
11 right?

12 A Correct.

13 Q And that property was under contract for sale until we  
14 made a motion asking this Court to issue prejudgment  
15 attachment, correct?

16 A Correct.

17 Q And the Court did grant that motion, right?

18 A Correct.

19 Q And after that was granted, you took it off -- you -- you  
20 were -- you didn't consummate the sale, correct?

21 A I don't understand the question.

22 Q You didn't actually sell it after the Court issued its  
23 order, correct?

24 A I didn't actually sell it?

25 Q 148 Clay Pit Road remains in your possession.



1 A I just don't like the way you word questions. I don't  
2 understand. I didn't actually sell it.

3 The agent's supposed to sell it and my attorneys  
4 contact with the agent with the real estate attorney. So I  
5 don't understand the question.

6 Q It's no longer under contract as of today, correct?

7 A I think it's still under -- it's still under contract.

8 Q When do you expect that property will be sold?

9 A I think you know better than me because they're working  
10 with you. That attorney doesn't call me, never returned my  
11 call. I don't know what's going on.

12 THE COURT: What is the price that is being paid for  
13 that property?

14 THE WITNESS: I think it was 999, 975 or something  
15 like that, 995.

16 THE COURT: So 995,000?

17 THE WITNESS: Right.

18 THE COURT: All right.

19 Q Okay.

20 Later in --

21 MR. KATAEV: Sorry withdrawn.

22 Q In 2021 you purchased 1475 Moon Valley Drive in Florida,  
23 correct?

24 A Correct.

25 Q It was bought for \$684,500, right?



1 A Correct.

2 Q And this property was sold in May of '23, about a week  
3 after the May 4th hearing, correct?

4 A Correct.

5 THE COURT: Mr. Kataev, go a little slower.

6 Q That property sold for 760,000?

7 A Right.

8 Q And the profit on that property was \$111,500, correct?

9 A I'm not sure exactly, but probably.

10 Q Okay.

11 A I don't know actually. I don't know what the profit was  
12 of the. Numbers, too much stress. I just needed -- I got the  
13 money and paid off whatever bills I had because of the case.

14 Q You also purchased another property in Pennsylvania a few  
15 months later in 2021, right?

16 A I believe so.

17 Q You bought 5265 Milford Road in April of 2022, correct?

18 A Correct.

19 Q And 535,000 was paid for that property, right?

20 A Correct.

21 Q This property was placed for sale in October of 2022 for  
22 899,000, correct?

23 A Correct.

24 Q But you removed this property from the market in  
25 December of '23, right?



1 A No.

2 Q That property remains on the market?

3 A I will explain. I remove it. I had it for sale, nobody  
4 was buying. It just up and the contract ran out. I did not  
5 remove it. It just expired.

6 Q Okay.

7 All of the properties that we discussed, except for  
8 the Staten Island home, were short-term rentals, correct?

9 A Correct. Actually, no. Philadelphia was not.

10 Q Other than the Staten Island property and the one  
11 Philadelphia property, you made income from renting those  
12 properties, correct?

13 A I had to produce a profit, is that what you're asking?

14 Q No, you made income from renting them, correct?

15 A There was income, correct, most months.

16 Q Okay.

17 But in 2023, you sold two of those properties that  
18 make you an income, correct?

19 A I don't think it's considered. I don't know if that's  
20 considered income. I'm not an accountant. But I don't think  
21 it was considered income.

22 Q Whenever --

23 A Definitely didn't feel like it.

24 Q Whenever you rent these properties, people pay you in  
25 order to rent them, correct?



1 A Well, income is -- I pay taxes on it. If it's a loss, I  
2 consider it's a loss. I don't think I made income. I didn't  
3 have properties long enough to make income.

4 Q You received money for these short-term rentals, correct?

5 A Obviously, that's why I had to off-load them. What I did  
6 is I off-loaded them to pay all the legal bills for the  
7 excessive -- excessive motions and all this stuff going down  
8 because, you know, for lack of better terms.

9 Q After the expanded preliminary injunction in March of  
10 '23, you placed all the properties for sale, correct?

11 A At the same time to see which one could sell first so I  
12 could pay my attorney.

13 Q You recently moved to Texas, correct?

14 A Correct.

15 Q You purchased a home there, right?

16 A Correct.

17 Q And you purchased it in July of '23, correct?

18 A Correct.

19 Q The property is 26118 Crosswood Trails Lane in Cypress,  
20 right?

21 A Correct.

22 Q And you purchased it for 690,000?

23 A Correct.

24 Q You never had any intentions of moving to Texas prior to  
25 this lawsuit, correct?



1 A Correct.

2 Q You've lived your entire life in New York, correct?

3 A Correct.

4 Q You moved to Texas to utilize the more favorable  
5 homestead exemption to protect yourself from a judgment in  
6 this case, correct?

7 A Incorrect.

8 Q You recognize that Judge Chen has concluded that IME  
9 WatchDog has a likelihood of success on the merits such that  
10 you and Ms. Gelardi's conduct will result in liability,  
11 correct?

12 A I really don't understand what you said but it sounds  
13 totally incorrect.

14 Q You moved to Texas to protect yourself from a judgment in  
15 this case.

16 A I moved to Texas to protect myself from all the cars  
17 parked in front of my house and all the harassment that we're  
18 getting from you guys. That's why we moved. We moved because  
19 of harassment.

20 You guys are criminals. You guys are all criminals.  
21 And you have me here, an innocent guy, I have no record. I  
22 moved to, to escape from you guys.

23 THE COURT: Next question.

24 THE WITNESS: Everybody knows you're criminals.  
25 Everybody knows.



1 THE COURT: All right. I am disregarding --

2 THE WITNESS: -- everyone's going to know.

3 THE COURT: I am going to disregard the outburst.

4 Let's move on.

5 MR. KATAEV: I may be done. I'm just going to check  
6 with my client.

7 THE COURT: All right.

8 MR. KATAEV: I have no further questions.

9 MR. WARNER: I have no further questions,  
10 Your Honor.

11 THE COURT: All right.

12 You may step down, Mr. Gelardi.

13 Let's call Mr. Liddie.

14 (Witness excused.)

15 THE COURT: Let me just say, Mr. Kataev, technically  
16 you have eaten up your time. Mr. Warner gets to start with  
17 this witness.

18 MR. KATAEV: Okay.

19 THE COURT: You will get to cross.

20 Let's go.

21 MR. WARNER: In the interests of moving this ahead,  
22 I don't -- Your Honor, I would defer to him to start with this  
23 witness.

24 THE COURT: Okay. Fine.

25 Let's go. Where is Mr. Liddie?



1 MR. ROA: He's coming.

2 THE COURT: Okay.

3 This will be the last witness because we are already  
4 over the allotted time.

5 MR. KATAEV: We don't have any other witnesses. No  
6 one showed up for the subpoenas.

7 THE COURT: Okay.

8 (Witness enters and takes stand.)

9 THE COURT: Mr. Liddie, take the stand. Come up to  
10 the stand and remain standing for a moment.

11 Sorry about that, Mr. Roa.

12 THE COURTROOM DEPUTY: Please raise your right hand.

13 **EUGENE LIDDIE,**

14 called as a witness having been

15 first duly sworn, was examined and testified

16 as follows:

17 THE WITNESS: Yes.

18 THE COURTROOM DEPUTY: Have a seat.

19 Please state and spell your name for the record.

20 THE WITNESS: Eugene Liddie, E-U-G-E-N-E,

21 L-I-D-D-I-E.

22 THE COURT: So Mr. Felsen, in the interest of time,  
23 I am going to give you a half an hour because there are a  
24 number of matters --

25 Mr. Kataev, I think you are rubbing against the



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1 microphone.

2 -- because we do need to wrap this up, so I will  
3 give you half an hour.

4 MR. FELSEN: Thank you, Your Honor.

5 DIRECT EXAMINATION

6 BY MR. FELSEN:

7 Q Good afternoon, Officer Liddie.

8 My name is Jamie Felsen. I am one of the attorneys  
9 for the plaintiff in this case.

10 During the recess that we had today, did you speak  
11 with Safa Gelardi or Vito Gelardi or their counsel?

12 A No. No.

13 Q You are here today pursuant to a subpoena, correct?

14 A Yes.

15 Q And when you were served with a subpoena to appear today,  
16 you were also served with a subpoena to produce documents;  
17 isn't that right?

18 A I -- I never received a -- I believe you guys first sent  
19 the subpoena -- I never received the first subpoena that  
20 apparently you guys sent. So Mr. Warner sent me a subpoena.

21 THE COURT: For documents or to appear today?

22 THE WITNESS: To appear.

23 THE COURT: What about for documents?

24 THE WITNESS: Nothing.

25 THE COURT: You never received documents --



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1 THE WITNESS: I never received, no.

2 THE COURT: You have to wait until I finish.

3 THE WITNESS: Sorry.

4 THE COURT: All right.

5 You never received a document subpoena?

6 THE WITNESS: No.

7 THE COURT: All right.

8 Go ahead, Mr. Felsen.

9 MR. FELSEN: Your Honor, I suppose we could deal  
10 with this after.

11 THE COURT: Yes.

12 MR. FELSEN: But we have an affidavit of services,  
13 they were both served together on Mr. Liddie.

14 THE COURT: Okay.

15 All right. I will look at that later unless you  
16 want to cross-examine him on that.

17 BY MR. FELSEN:

18 Q So, you -- you're not familiar with the documents that  
19 we're asking for since you're claiming that you never got that  
20 subpoena; is that accurate?

21 A I never received the subpoena.

22 THE COURT: Do you want to ask him when he  
23 supposedly was served in person?

24 Q So were you served in person at all with any subpoena or  
25 are you saying Mr. Warner sent you the subpoena?



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1 A The only subpoena I received at my home was the one from  
2 Mr. Warner.

3 Q So Mr. Warner mailed you a subpoena?

4 A Yes.

5 Q You didn't receive a subpoena from a process server?

6 A No.

7 Q And when was it that Mr. Warner mailed you the subpoena?

8 A I received it last week.

9 THE COURT: So what does your process affidavit say,  
10 Mr. Felsen?

11 MR. FELSEN: The subpoenas were served on Saturday,  
12 April 13th at 5:59 p.m. It was accepted by a Jane Doe,  
13 refused to provide a name, a co-tenant.

14 THE COURT: At what address?

15 MR. FELSEN: 329 Brookville Avenue in Islip, New  
16 York.

17 Q Is that your home address?

18 A That's my home address.

19 Q Do you reside with somebody at that address?

20 A I reside alone but it's a two-family home.

21 Q And nobody provided you with a subpoena?

22 A No.

23 THE COURT: When you say two-family home, the second  
24 home is occupied by somebody who is not your family member or  
25 related to you?



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1 THE WITNESS: No, it is. It's actually my sister  
2 and my mom.

3 THE COURT: Okay.

4 THE WITNESS: Yeah.

5 THE COURT: So your sister or your mother never gave  
6 you a subpoena that was served at that address?

7 THE WITNESS: No, I wasn't -- no, they did not give  
8 me a subpoena. No, they did not.

9 THE COURT: All right.

10 Go ahead.

11 THE WITNESS: My sister actually --

12 MR. FELSEN: Your Honor, may I hand the witness the  
13 subpoena that was served and ask the Court to direct him to  
14 respond to the subpoena?

15 THE COURT: No, let's move on. Why don't you ask  
16 him questions and we will deal with that in a minute, or at  
17 the end.

18 THE WITNESS: Your Honor, I don't know if -- so, on  
19 the -- my sister was, she --

20 THE COURT: I do not want to talk about this  
21 anymore. Let's go on with the testimony and we can deal with  
22 the subpoena issue later.

23 I assume you are willing to respond to a document  
24 subpoena.

25 THE WITNESS: Of course.



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1 THE COURT: Okay.

2 Let's go.

3 BY MR. FELSEN:

4 Q Did you have any conversations with Safa leading up to  
5 today's hearing?

6 A No.

7 Q Did you prepare for today's hearing?

8 A No.

9 Q Did you speak with Jonathon Warner, Safa's attorney?

10 A I spoke to him before he issued a subpoena.

11 Q And what was the conversation that you had with  
12 Mr. Warner?

13 A He was just informed me that they had a court proceeding  
14 coming and I should appear.

15 Q Did you --

16 A Based on -- sorry.

17 Q Sorry.

18 A Based on what's the alleged or allegations against me, he  
19 advised that I probably should have -- I should probably  
20 notify my attorney.

21 Q And did he describe for you the nature of today's  
22 proceeding and why you were being called to testify?

23 A He did mention it was a contempt against I guess Safa and  
24 Vito Gelardi.

25 Q And what else did he say in that regard?



1 A That was pretty much it.

2 Q And you had no conversations with Safa or Vito after you  
3 spoke with Mr. Warner?

4 A No, not after. They did call me last month and mentioned  
5 that -- sorry.

6 They did call me last month and apologized and said  
7 that he did have my name as being dragged into court again, or  
8 I might be dragged into court again.

9 Q Anything else during that conversation?

10 A No, they just apologized.

11 Q Did anybody from the defendants' side, meaning the  
12 Gelardis or their counsel, send you any documents to prepare  
13 for today's hearing?

14 A No.

15 THE COURT: You seem to hesitate. Did anyone send  
16 you documents --

17 THE WITNESS: My attorney, yes. My attorney sent  
18 me, yes.

19 THE COURT: Okay.

20 And do you know -- do you know whether or not those  
21 documents came from the Gelardis? Do you have any idea of how  
22 your lawyer got them?

23 THE WITNESS: Yeah. I -- I believe she got them  
24 from Mr. Warner, yes.

25 THE COURT: And did you review those to prepare for



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1 today --

2 THE WITNESS: Yes, I did.

3 THE COURT: -- for your testimony.

4 THE WITNESS: I did look those over. Yes, she told  
5 me to look them over.

6 THE COURT: All right.

7 What documents did you receive?

8 THE WITNESS: Emails. And -- it was emails. It  
9 was --

10 THE COURT: Was it emails with Giant Partners?

11 THE WITNESS: Yes.

12 THE COURT: Okay.

13 What other emails?

14 THE WITNESS: Those were the only emails because I  
15 didn't look through everything. I didn't have a chance to  
16 look. It was a lot of stuff. I didn't have a chance to go  
17 through everything.

18 THE COURT: You have got to keep your voice up.

19 Go ahead.

20 BY MR. FELSEN:

21 Q Did you discuss those emails with anybody?

22 A With my attorney.

23 Q Are the Gelardis paying for your legal fees in connection  
24 with this case?

25 A No.



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1 Q You've never spelled your last name any other way other  
2 than L-I-D-D-I-E, correct?

3 A That's how you spell it. L-I-D-I-E [sic].

4 THE COURT: L-I-D-D-I-E.

5 THE WITNESS: I-E. Yeah.

6 Q So you have never spelled is any other way, correct,  
7 because that's the way you spell it?

8 A I never spelled it any other way, no.

9 Q And we know from the last time you testified that when  
10 IME Legal Reps had its website set up initially, your name was  
11 misspelled on that website L-I-D-D-Y.

12 Do you recall that testimony?

13 A Yes.

14 Q And you testified that the web developer or IME Legal  
15 Reps made a mistake?

16 A No, I said it was -- it must have been a typo in the  
17 computer by the spell check. You do spell check before you  
18 send the e-mail. You could use a Y or I-E for my last name.  
19 And it was in the spell check. The correct way to spell it is  
20 I-E.

21 Q Was that testimony truthful that you gave on May 4th with  
22 respect to the mistake on the website of your spelling of your  
23 name and that you didn't provide it to anybody?

24 A Was -- repeat that, sorry.

25 Q The testimony you gave on May 4th that the misspelling of



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1 your name was not made by you. Was that testimony correct?

2 A No, it was made by me. I don't understand what you're  
3 saying.

4 Q So you spelled it L-I-D-D-I-E, but you're saying --

5 A No, I'm saying probably it was a typo.

6 Q You don't know for sure whether it was a typo?

7 A Had to have been because that's not how you spell my  
8 name.

9 Q Now the website company that you were testifying about on  
10 May 4th, that's Giant Partners, correct?

11 A Yes.

12 THE COURT: So we are clear, when you folks refer to  
13 May 4th testimony you are talking about 2023, right?

14 THE WITNESS: Yes.

15 THE COURT: Okay.

16 Go ahead.

17 Q Was your name misspelled on the IME Legal Reps's website  
18 because Safa doesn't know how to spell your name and that's  
19 the spelling that she provided to Giant Partners?

20 A No, I --

21 MR. WARNER: Objection, Your Honor.

22 THE COURT: Sustained.

23 THE WITNESS: Answer?

24 THE COURT: No, do not answer.

25 Q Now, in addition to being the website developer for IME



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1 Legal Reps, Giant Partners is also the marketing company,  
2 correct?

3 A No. They -- they -- they are a marketing company, but  
4 yeah, I never used them for marketing.

5 Q What services has Giant Partners provided to IME Legal  
6 Reps?

7 A They migrated the website and did the coding and changed  
8 up -- changed up -- changed up the website once I purchased it  
9 from the Gelardis.

10 Q And they've done no marketing?

11 A No.

12 Q Has any company done marketing for IME Legal Reps?

13 A No.

14 Q So you're still relying on just cold-calling to get  
15 customers?

16 A Yes.

17 Q And who's responsible for doing the cold-calling?

18 A I am.

19 Q Are you still a police officer?

20 A Yes.

21 Q You still full-time?

22 A Yes.

23 Q What hours do you work with the NYPD?

24 A I work 7:00 a.m. to 3:30.

25 Q So you cold call at night?



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1 A No. On my days off.

2 Q What days are you off?

3 A It rotates. It's a rotating schedule.

4 Q How many days do you have off each week?

5 A So it's two days off and then every third week it's three  
6 days off.

7 Q So you're restricted in marketing for your company to  
8 only two days per week, correct?

9 MR. WARNER: Objection.

10 THE COURT: Overruled.

11 THE WITNESS: I can answer?

12 THE COURT: Yes, you can answer that.

13 A Yes, that's my availability.

14 Q Giant Partners was the marketing company for  
15 IME Companions, correct?

16 A Yes. To my knowledge, yeah.

17 Q Now, you were thinking of opening an extension or a  
18 franchise of IME Companions at some point, correct?

19 A No. As an extension -- yes, they were going to franchise  
20 at some point, yes.

21 Q Right.

22 A Yes.

23 Q And you testified last time that you did some free  
24 marketing for IME Companions with using your  
25 Eugene@IMECompanions e-mail address, correct?



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1 A Yes.

2 Q And you testified that you did not end up opening that  
3 franchise or extension because there was an injunction issued  
4 by this Court, correct?

5 A Well, yeah. Yes, they didn't franchise.

6 Q But in any event, you ended up opening IME Legal Reps,  
7 correct?

8 A But it's not a franchise. But I did open it, yes.

9 Q Are you actively seeking to get promoted in ranking at  
10 the NYPD?

11 MR. WARNER: Objection, Your Honor. What's the  
12 purpose of this testimony?

13 THE COURT: Overruled.

14 You can answer that.

15 A Yeah. No desire.

16 Q Now you testified that your hours are primarily 7:00 a.m.  
17 to 3:30. Is there any overtime involved?

18 A No.

19 Q Among your duties as an officer is to appear in court and  
20 testify; is that correct?

21 A It's -- that's occasional. That's every -- so it just  
22 depends what happens. Like if you writing moving violations  
23 and you have to appear for a court date, yeah.

24 If I write a moving infraction and you have to  
25 appear in court to testify, then that's the only time I would



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1 pretty much testify.

2 Q Isn't it true that the justice system relies on the  
3 honesty of officers like yourself to convict criminals?

4 A Yes.

5 Q So it's important for everyone, but especially police  
6 officers to always testify truthfully, correct?

7 A Absolutely.

8 Q Since the last time you testified in this case, have you  
9 sought consent from the NYPD to continue operating IME Legal  
10 Reps?

11 A No.

12 Q IME Legal Reps uses the same website hosting company as  
13 IME Companions, which is GoDaddy; isn't that true?

14 A Repeat that one time. I'm sorry.

15 Q IME Legal Reps uses the same website hosting company as  
16 IME Companions, which is GoDaddy, correct?

17 A I don't -- I'm not sure who they use for -- that's who I  
18 used, was GoDaddy.

19 Q Isn't it true that when you purchased the website from  
20 Safa, she had to transfer everything over from GoDaddy and  
21 provide you with account information?

22 A Yes. Yes.

23 Q So it's true then that it was GoDaddy with IME Companions  
24 and it's also GoDaddy with IME Legal Reps, correct?

25 A Correct.



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1 Q Since you bought the IME Companions's website from the  
2 Gelardis, how many different observers has IME Legal Reps  
3 used?

4 A You talking about how many firms?

5 Q No, how many observers.

6 THE COURT: Watchdogs. Companions. Whatever you  
7 want to call them. The people who go to the exam.

8 THE WITNESS: Oh.

9 THE COURT: How many different people have you used?

10 THE WITNESS: In the independent contractors.

11 THE COURT: Yes.

12 THE WITNESS: Yeah, okay.

13 I believe six or seven people. Seven, I believe.

14 BY MR. FELSEN:

15 Q Christian Hogarth is one of them, correct?

16 A Yes.

17 Q Tiffany Uribe is one of them, correct?

18 A Was. Yes.

19 Q Marc Purificati is one of them as well, correct?

20 A Yes.

21 Q Jeff Beibin is also one of them, correct?

22 A Yes.

23 Q Sara Gonzalez is also one of them, correct?

24 A I believe she did one or two, yes.

25 Q And Lizbeth Medina is also one of them, correct?



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1 A Yes. And there's a Joseph. He did about two or three  
2 and then Martha did two or three.

3 Q What's Joseph's last name?

4 A I can't recall. About two or three.

5 Q What about Martha? What's her last name?

6 A I can't recall.

7 Q How did you -- how did you find these individuals to  
8 become observers for you?

9 A I do referrals and just networking, just friends. And  
10 some of the seasoned people, like Marc Purificati, his fiancée  
11 is Tiffany Uribe, so they kind of like came together, in a  
12 sense. They came together in a sense because they're  
13 together. So.

14 THE COURT: Is it correct that all of them used to  
15 work for IME Companions?

16 THE WITNESS: Yes.

17 THE COURT: All right.

18 Let's go.

19 Q And the referrals for you to hire them came from Safa  
20 Gelardi, correct?

21 A No.

22 Q Who did the referral come from?

23 A Jeff.

24 THE COURT: Jeff Beibin.

25 THE WITNESS: Jeff Beibin.



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1 THE COURT: Who is the brother-in-law of  
2 Ms. Gelardi; is that right?

3 THE WITNESS: Of Mr. Gelardi?

4 THE COURT: Mr. Gelardi? Okay.

5 THE WITNESS: Yes.

6 Q And Mr. Beibin previously worked for Safa and Vito,  
7 correct?

8 A Yes.

9 Q Now you testified previously that Jeff Beibin, when he  
10 testified at the May 4th hearing, Jeff Beibin is the only  
11 person that was actually performing, observing IMEs; isn't  
12 that correct?

13 A Yes.

14 Q And it was that testimony afterward that he was the only  
15 one after May 4th, 2023, observing IMEs?

16 A Yes.

17 Q Now, at the time of that hearing on May 4th, 2023, IME  
18 Legal Reps was operating for less than a month, correct?

19 A For less than a month, yes. Yeah.

20 Q Now, just like IME Legal Reps is utilizing the same  
21 observers as IME Companions, isn't it true that all of IME  
22 Legal Reps's customers are customers that were customers of  
23 IME Companions?

24 A No.

25 Q How many customers does IME Legal Reps have?



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1 THE WITNESS: Your Honor, so, I will say this. Last  
2 time I did this, when I left this courtroom, they went -- they  
3 went berserk. Like.

4 THE COURT: Who is they?

5 THE WITNESS: So Daniella Levi, I don't know this  
6 lady. I just know her from this.

7 THE COURT: But the question is how many customers  
8 you have. That is the question.

9 THE WITNESS: I probably have seven or eight right  
10 now.

11 THE COURT: Okay.

12 And how many did you have the last time you  
13 testified?

14 THE WITNESS: Three.

15 THE COURT: Okay.

16 Go ahead.

17 Q So who are the five additional, the four or five  
18 additional customers that you've gotten since the last hearing  
19 about a year ago?

20 MR. WARNER: Objection, Your Honor.

21 THE COURT: Overruled.

22 MR. WARNER: What's the basis for the -- how does  
23 this --

24 THE COURT: Overruled.

25 MR. WARNER: -- the issues that, Your Honor, has --



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1 THE COURT: The question -- the questions are  
2 whether or not they are on the enjoined list and whether or  
3 not there is some connection between the Gelardis and  
4 Mr. Liddie.

5 THE WITNESS: Okay.

6 THE COURT: So who are your customers?

7 THE WITNESS: So I have Russotto Law. Zemsky.

8 THE COURT: Zemsky. Yes.

9 THE WITNESS: I have Marshall law, Law Office of  
10 Marshall. Rosenbaum & Rosenbaum. I have Ginarte.

11 THE COURT: How do you --

12 THE WITNESS: Ginarte and Winograd.

13 THE COURT: Can you spell that first name.

14 THE WITNESS: G-I-N-A-R-T-E.

15 THE COURT: Okay.

16 THE WITNESS: And Winograd.

17 THE COURT: Oh, Ginarte, right.

18 Okay.

19 THE WITNESS: Right.

20 And then I lost Martin Ginseng and Cohan Law.

21 THE COURT: Who did you lose?

22 THE WITNESS: Cohan Law.

23 THE COURT: Cohan Law, okay.

24 THE WITNESS: And I have Mr. Bergman still.

25 THE COURT: Mr. Bergman.



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1 THE WITNESS: Bergman? Bergman & Bergman. Yeah.

2 THE COURT: Mr. Felsen?

3 Q Now, several of those --

4 A Oh, and I also have Cherny.

5 THE COURT: Cherny? Okay.

6 THE WITNESS: Cherny.

7 Q Several of those customers are on the enjoined customer  
8 list, correct?

9 A I wouldn't know.

10 Q How did you obtain Zemsky as a client?

11 A He was a Long Island firm. So I looked him up. I  
12 visited about 60, 65 firms as of when I last left this  
13 courtroom. Myself.

14 Dropped off Edibles. Dropped off an Edible  
15 arrangements for my firms. And then I also give them a  
16 folder, some pens, my card.

17 THE COURT: Have to be careful with the term  
18 Edibles. You are talking fruit, right?

19 THE WITNESS: Yeah, sorry.

20 Q Now, at the last hearing, at the conclusion of your  
21 testimony, you were provided with a copy of the enjoined  
22 customer list, correct?

23 A No.

24 THE COURT: Have you ever gotten a copy of it?

25 THE WITNESS: No.



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1 THE COURT: Okay.

2 Go ahead.

3 Q So Zemsky, you just -- you just went into their office  
4 and asked to speak with them and they signed up with you?

5 A Yeah. I do with every office. I go to some offices,  
6 some -- some -- some law firms don't use any IME service.  
7 Some do. And the ones that do, I still leave my material. I  
8 still leave my Edibles for that their time and then I leave.  
9 Edible arrangement and then I leave.

10 I don't slander. I don't, you know, trash another  
11 company. I leave. I say, hey, you can use us as a backup,  
12 use us as another option. If you ever have last minute, or  
13 you have an emergency, we're here.

14 Q And Ginarte is another customer on the enjoined customer  
15 list.

16 How did you get them?

17 MR. WARNER: Objection, Your Honor to the  
18 pre-question speech.

19 THE COURT: Overruled. Overruled.

20 Go ahead.

21 A That was actually a referral from a friend who actually  
22 used them.

23 Q From who?

24 A A friend.

25 Q Safa Gelardi?



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1 A No.

2 Q Who?

3 A A friend of mine.

4 Q What's his name. Or her name?

5 A It's -- it was Joseph Barkerman.

6 Q So you've obtained about four or five new customers in  
7 the last year, several of whom are on the enjoined customer  
8 list.

9 A Okay.

10 Q Correct?

11 A I -- I -- I don't --

12 THE COURT: He does not remember. Okay.

13 Q On April 10th, 2023, you signed a contract with the  
14 Gelardis to buy the Companions's website, correct?

15 A Yes.

16 Q And I think you testified previously you paid 4300 bucks  
17 because they needed to make a mortgage payment, correct?

18 A That's what they was -- that's what was told to me, yes.

19 Q Now, four days later, on April 14th, you already were  
20 covering an IME; isn't that true?

21 A Four days later? Not that I'm aware of, no.

22 MR. FELSEN: Okay. I'm going to show you what's  
23 previously marked as Plaintiff's Exhibit 73.

24 (Exhibit published.)

25 Q So this is a declaration that was submitted in this case.



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1 It's dated May 16th, 2024. The declaration is for Clifford  
2 Gabel from Bergman, Bergman, Fields & Lamonsoff, and he  
3 declares in this declaration that he -- well, the firm,  
4 Bergman, Bergman, remained IME Legal Reps for an IME of a  
5 Ms. Burns on April 14th, 2023.

6 Does that refresh your recollection?

7 A Yeah, that's correct, yeah.

8 Q So in four days, after buying the website and having no  
9 experience in the IME industry, you knew what to do as an IME?

10 A I -- I didn't go to that IME. Me personally, I didn't.

11 Q Who attended that IME?

12 A It was Jeff Beibin.

13 Q Safa's relative, right?

14 THE COURT: Vito's relative.

15 A Vito's relative.

16 Q And that IME on April 14th, 2023, was actually performed  
17 before IME Legal Reps even was formed as a corporate entity;  
18 isn't that true?

19 A Correct.

20 Q IME Legal Reps wasn't formed as a corporate entity until  
21 about a month later on May 9th, 2023; is that correct?

22 A That sounds about right. I can't -- don't know exact  
23 date, but yeah, something like that.

24 Q And you were covering -- well, IME Legal Reps was  
25 covering IMEs before IME Legal Reps even had a bank account



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1 open, correct?

2 A Correct.

3 Q When did you actually first open a bank account for IME  
4 Legal Reps?

5 A It was in May.

6 Q May of '23?

7 A Yes.

8 Q And which bank did you open an account with?

9 A Chase.

10 Q IME Legal Reps was incorporated in Texas, correct?

11 A Correct.

12 Q But you don't live in Texas, correct?

13 A No.

14 Q You've always lived in New York; is that correct?

15 A Yes, yeah.

16 Q And you don't perform any IMEs in Texas, do you?

17 A No. I'm expanding. I was in Florida for two weeks. I'm  
18 going to shoot out to Chicago and then I'm going to shoot out  
19 to Texas, yeah. Dallas. My brother's in Texas.

20 Q So you -- just so I understand, are you going -- are you  
21 making the rounds to try to drum up business in these other  
22 states?

23 A Absolutely.

24 Q Even though you only have about eight customers in  
25 New York?



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1 A I said that's fine. Yeah, you got to expand. I mean, I  
2 can't just stay in New York if I'm not getting any traction in  
3 New York. I have to go other places.

4 Q It's hard to cold call, right?

5 A I wouldn't say it's hard. It's not hard. It's  
6 challenging. It's definitely challenging because you're  
7 actually -- you're -- you're selling your services and a law  
8 firm actually has to buy into your service.

9 Like, it's a whole law firm. It's like, it's not --  
10 not trying to sell candy. It's a law firm. These are  
11 lawyers. They have to buy into your services. They have to  
12 want to switch if they're using someone or if not using any  
13 service, they have to see the value in your service.

14 Q It's a lot easier when you've got a list to work off of,  
15 correct?

16 A I -- no.

17 Q When was the last time you went to Texas?

18 A I went to Texas, probably was 20 -- I think it was  
19 Christmas of '22, I think. I can't -- I can't recall exactly.  
20 It was a Christmastime because I took my daughter to see my  
21 brother and his kids.

22 Q And Safa and Vito Gelardi live in Texas, correct?

23 A Yeah.

24 Q Did they tell you when they were moving there?

25 A No.



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1 Q How did you find out that they live there?

2 A Through Jeff.

3 Q What did Jeff tell you in that regard?

4 A He told me that they'd moved.

5 Q Did you organize the corporate entity IME Legal Reps in  
6 Texas because that's where Safa and Vita reside?

7 A No.

8 THE COURT: Mr. Felsen, you are going to have to  
9 wrap this up because you only had a half an hour and I want to  
10 give Mr. Warner a chance.

11 THE WITNESS: They're -- can I speak, Judge? Can I?

12 THE COURT: Yes, go ahead.

13 A So they're, -- to my knowledge, they're in Houston. My  
14 brother lives 45 minutes outside of Dallas, which is  
15 Rockville, Texas, Fate. So that's about four hours away. And  
16 he don't know them and they don't know him.

17 Q Okay.

18 Prior to the bank account being opened, IME Legal  
19 Reps, how did IME Legal Reps get paid for IMEs?

20 A How did they get paid?

21 Q Yes.

22 THE COURT: You did not have a bank account.

23 THE WITNESS: I didn't have a bank account. So I  
24 didn't have a bank account, but I also didn't submit the  
25 invoice until I opened the bank account.



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1 Q So you made no money until you opened up a bank account?

2 A Correct.

3 THE COURT: You did not invoice anyone?

4 THE WITNESS: I didn't invoice, yeah. I didn't  
5 invoice.

6 THE COURT: Can I ask you one question and I  
7 apologize if you answered it.

8 How did you get Bergman as a client? That was your  
9 first one it sounds like.

10 THE WITNESS: That was the first one. So I  
11 actually -- it was someone -- they called me. I got a  
12 referral that they called me and then I actually then called  
13 the firm. And then I set up an appointment with Mr. Bergman.

14 THE COURT: So Bergman called you on --

15 THE WITNESS: No, not Mr. Bergman. The firm. It  
16 was a referral.

17 THE COURT: But Bergman is a firm, right?

18 THE WITNESS: Yeah, it is a firm, yeah.

19 THE COURT: So did Bergman call you to cover that  
20 first IME?

21 THE WITNESS: They called to ask if I had an IME  
22 company.

23 THE COURT: How did they know about you, did they  
24 say?

25 THE WITNESS: No, they didn't say. No.



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1 THE COURT: Did they say who referred them to you?

2 THE WITNESS: No.

3 THE COURT: Did you have any thought as to how they  
4 got to you?

5 THE WITNESS: I did, but I guess I was more excited  
6 about the opportunity. So I said I wanted to talk with  
7 Mr. Bergman. So I -- I didn't ask who gave you my number.

8 THE COURT: Okay.

9 THE WITNESS: Like, I had a law firm just now that  
10 just called. I didn't ask, hey, how did you get my number.

11 THE COURT: You did not?

12 THE WITNESS: No.

13 THE COURT: It did not dawn on you to say, hey, how  
14 did you get my number? I just opened the business and I have  
15 not opened a bank account yet.

16 THE WITNESS: Correct, that's true.

17 THE COURT: You just accepted on face that some  
18 guardian angel was referring Bergman to you out of the blue?

19 THE WITNESS: No. I'm, I don't know how they got my  
20 number. I don't know if someone else told -- I don't know  
21 who.

22 THE COURT: I am going to ask what seems the obvious  
23 question. Did you assume it was the Gelardis?

24 THE WITNESS: No.

25 THE COURT: You did not?



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1 THE WITNESS: I did not assume that.

2 THE COURT: How did Mr. Beibin cover that? How did  
3 he come to cover that examination?

4 THE WITNESS: So when I purchased the website, I had  
5 already spoken with -- we had already spoken prior to that.  
6 Maybe the first week of April.

7 THE COURT: You and Mr. Beibin?

8 THE WITNESS: Yeah. We been spoke prior to that.  
9 So I already knew -- it was just a matter of being able to  
10 meet them to exchange the money.

11 THE COURT: So when Bergman called you, you called  
12 Mr. Beibin to cover it?

13 THE WITNESS: Yes.

14 THE COURT: All right.

15 Go ahead.

16 BY MR. FELSEN:

17 Q One of the items that we've requested in the subpoena are  
18 all communications between you and the Gelardis starting with  
19 March 10th, 2023.

20 MR. FELSEN: So Your Honor, we're going to need to  
21 get those communications, which I think will shed some light  
22 on what's going on here. And we'd like to recall the witness  
23 after that.

24 But I have a few more questions. I know you're  
25 trying to get through this.



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1 I would just like to show the witness --

2 MR. WARNER: I object. It took two-and-a-half hours  
3 He knew that they were supposed to split evenly the time.

4 THE COURT: Agreed.

5 Mr. Felsen, take a seat.

6 Mr. Warner, your witness.

7 And someone better ask him about the Giant emails.

8 Go ahead. Giant Partners, that is what I want to  
9 hear about.

10 MR. FELSEN: I have one more exhibit I wanted to --

11 THE COURT: All right. That is it. Then sit down.

12 MR. FELSEN: I want to show you what was previously  
13 entered into evidence as Exhibit 54.

14 (Exhibit published.)

15 Q Mr. Liddie, this is an e-mail from IME Legal Reps to  
16 Estefania Sedano at GiantPartners.com along with some copies.

17 Have you ever seen this e-mail before?

18 A Yeah.

19 Q Did you send this e-mail?

20 A Yes.

21 Q And it -- your name --

22 THE COURT: Did you misspell your own name?

23 THE WITNESS: Once again, yeah. Obviously, yes,  
24 because when I did the spell check, it probably put I-E -- I  
25 mean Y. It normally does that.



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1 Q So not once, but twice, right?

2 A Correct, because I did the spell check once the e-mail  
3 was completed.

4 Q You do spell check every time you send an e-mail?

5 A Sure.

6 Q And how -- has there ever been an occasion where Outlook  
7 has changed your name from L-I-D-D-I-E to L-I-D-D-Y?

8 A Yes.

9 Q And does that happen, since you spell check every time,  
10 doesn't that happen every time you send an e-mail?

11 A Yes, but I probably sent the e-mail quicker than I  
12 actually checked it. I probably didn't look over the e-mail  
13 as thoroughly as I probably should have.

14 Q Now, in this e-mail, it talks about -- it says: We need  
15 the website up as IME Legal Reps's vision immediately.

16 What is IME Legal Reps's vision?

17 A I wanted it to -- well, it wasn't what it was. I  
18 wanted -- I was changing the website over. So I wanted to  
19 create my own vision as far as our purpose, our mission  
20 statement, and what we were going to put on the site to do  
21 the -- for advertisement.

22 Q And you're certain that you sent this e-mail and Safa did  
23 not send this e-mail?

24 A I'm certain.

25 Q Did you ever come to learn that Safa was sending emails



1 from IME Legal Reps's e-mail address?

2 A No, I'm not aware of that. The only two people who have  
3 access to the e-mail is myself and Jeff Beibin.

4 (Pause in the proceedings.)

5 Q What are the GoDaddy credentials for IME Legal Reps?

6 A What do you mean what are the credentials?

7 Q How do you log on?

8 A Why would I tell you my password?

9 Q What is it?

10 THE WITNESS: Tell him the password?

11 THE COURT: Yes.

12 A It's the e-mail IMELegalReps.com@gmail.com.

13 And then it's --

14 THE WITNESS: My password, too?

15 THE COURT: Yes. I mean I am a little concerned  
16 about --

17 THE WITNESS: My password, like --

18 THE COURT: Is there a reason for you to ask this  
19 specific question? Why don't you ask affirmatively? Either  
20 way, it is not good. You are asking him to disclose  
21 confidential information about his own account, his current  
22 account, right?

23 Q Well, did somebody provide you with the user name and  
24 password for the account?

25 A No.



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1 THE COURT: Why don't you show him the emails that  
2 relate to this issue.

3 Sorry, Mr. Warner, but this is something I need  
4 to --

5 MR. WARNER: I was going to ask about those emails  
6 anyway so it's fine.

7 THE COURT: Okay.

8 MR. WARNER: Although I don't think it's appropriate  
9 to ask for present password, Your Honor.

10 THE COURT: Yes, I would like to avoid that, if we  
11 can.

12 (Exhibit published.)

13 MR. KATAEV: He can change the password after the  
14 hearing, Your Honor.

15 THE COURT: Well, that is true, but --

16 MR. FELSEN: All right.

17 I'm showing you what was previously entered into  
18 evidence as Exhibit 55.

19 (Exhibit published.)

20 Q So there's an e-mail here at the bottom from April 11,  
21 2023, at 10:14 a.m. from IME Legal Reps to Corey Weissman.  
22 And it's got information for a GoDaddy account.

23 Do you see that?

24 A I do, yeah.

25 Q Where did you get that information from?



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1 THE COURT: Well, hold on.

2 Do you know who sent that e-mail?

3 THE WITNESS: Oh, I sent that e-mail. Yeah.

4 THE COURT: Okay.

5 Go ahead.

6 Q And where did you get that log-in information?

7 A I got that from Safa Gelardi.

8 Q She -- how did she convey it to you, by text? E-mail?

9 A Oh, no, we spoke over the phone. I told her that they  
10 was emailing and they needed her credentials to be able to log  
11 in to start the process of the migration.

12 Q And if you scroll down, if you go to the second page,  
13 your name is spelled wrong again in an e-mail from Corey to  
14 Safa.

15 Do you know why that is?

16 A I have no clue.

17 Q So there's no like, four or five occasions where your  
18 name is spelled wrong, right?

19 A Correct.

20 Q And did anybody ever correct Giant Partners that the  
21 spelling was wrong on your name?

22 A Yes.

23 Q Who did you speak to about that?

24 A Estefania Sedano.

25 Q Did you send her an e-mail?



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1 A No, we spoke over the phone.

2 Q Now, at your last hearing -- at the last hearing, you  
3 testified that you only communicated with Giant Partners by  
4 phone, correct?

5 A I did.

6 Q And we're seeing today -- we just saw a couple emails,  
7 but there's a whole slew of emails between IME Legal Reps and  
8 Giant Partners.

9 Do you know why that is?

10 A Because that was -- I communicated by phone, but I had to  
11 also do a migration. So it's both phone and text. I mean,  
12 both phone and e-mail, sorry.

13 Q But you remember testifying at the last hearing that you  
14 exclusively communicated with Giant Partners by phone,  
15 correct?

16 A Correct.

17 Q Okay.

18 THE COURT: But that is not true.

19 THE WITNESS: No, I said it was both.

20 THE COURT: Okay.

21 THE WITNESS: Yeah.

22 MR. FELSEN: Your Honor, I have a lot more  
23 questions, but I understand --

24 THE COURT: Let Mr. Warner, yes, ask questions now  
25 of this witness.



Liddie - cross - Warner

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1 CROSS-EXAMINATION

2 BY MR. WARNER:

3 Q Good afternoon, Mr. Liddie.

4 Mr. Liddie, after the migration of the website was  
5 complete, did you have any further involvement with Safa  
6 Gelardi?

7 A No.

8 Q Did you ever pay her any money --

9 A No.

10 Q -- other than the \$4,300 that you paid for the website?

11 A No.

12 Q Is she a partner, or officer or member or anything else  
13 involved in your business?

14 A No.

15 MR. FELSEN: Objection. Leading.

16 THE COURT: Overruled.

17 A No.

18 Q Did she ever ask you for a piece of your business?

19 A No.

20 MR. WARNER: I have no further questions,

21 Your Honor.

22 THE COURT: All right.

23 Go ahead and ask your questions, Mr. Felsen.

24 I would like to get some responses about these  
25 emails I have been looking at. I would like to hear



Liddie - redirect - Felsen

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1 Mr. Liddie's response about who was sending them and who was  
2 communicating.

3 REDIRECT EXAMINATION

4 BY MR. FELSEN:

5 Q The password that Safa gave you --

6 THE COURT: You have to use the microphone.

7 Q The password that Safa gave you was for IME Legal Reps,  
8 right?

9 A No.

10 THE COURT: You want to show him which one? Because  
11 there have been a couple that have been discussed.

12 (Exhibit published.)

13 THE COURT: So this is in an e-mail dated April 11,  
14 2023, and it says: IMELegalReps@gmail.com.

15 THE WITNESS: Correct.

16 THE COURT: Okay.

17 So is that the password for that GoDaddy account?

18 THE WITNESS: No. So I put the e-mail there because  
19 that was her credentials for them to host, to change  
20 everything over. So that's -- according to Estefania, that's  
21 what they needed. They needed her credentials to look into  
22 her website.

23 THE COURT: So her credentials, in order to  
24 facilitate the migration with your company name and e-mail  
25 address, because isn't IME Legal Reps your company?



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1 THE WITNESS: Yes.

2 THE COURT: So you are saying her -- but she had an  
3 existing relationship with them through IME Companions, right?

4 THE WITNESS: Yeah, she spoke with Corey. Corey  
5 Weissman, I think his name was.

6 THE COURT: Right.

7 But were you aware she had an existing relationship  
8 with Giant Partners when she ran IME Companions; isn't that  
9 right?

10 THE WITNESS: Correct.

11 THE COURT: Okay.

12 So then why is her GoDaddy account using your  
13 company's name?

14 THE WITNESS: That wasn't -- that wasn't her.  
15 That's actually mine. But that password is hers. That's not  
16 my stuff.

17 THE COURT: I am sorry, but you are the one who sent  
18 this e-mail on April 11th and you report that the GoDaddy  
19 account is under your company's e-mail address. I do not know  
20 whose customer number that is, but it is her password for her  
21 IME Companions's account, right?

22 THE WITNESS: That's -- to my knowledge, yes, that's  
23 what that probably was, yeah.

24 THE COURT: Right.

25 So I am asking you, why did you use your company's



Liddie - redirect - Felsen

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1 e-mail address for the GoDaddy account you are referring them  
2 to when the purpose was for Giant Partners to access the  
3 IME Companions's GoDaddy account to migrate it to your  
4 business account?

5 THE WITNESS: That was my e-mail that I was using  
6 once they did the migration. That was going to be the e-mail  
7 I use once they did the migration.

8 THE COURT: But that is not what that e-mail says,  
9 right?

10 In other words, the password that you give them does  
11 not go to your e-mail address or --

12 THE WITNESS: No, no, no. But once they were the  
13 migrating, then I was going to create my own password and my  
14 own user name -- user login to be able to log into the website  
15 after the completion of the migration.

16 THE COURT: Right.

17 But so tell me what you were communicating starting  
18 where it says GoDaddy account. What information were you  
19 sending them and why?

20 THE WITNESS: I was sending information they asked  
21 for on one of the previous emails. They asked for Safa's  
22 credentials to be able to log in to her website.

23 THE COURT: Okay. So IMELegalReps@gmail.com, is  
24 that her credentials or yours?

25 THE WITNESS: No, that's mine.



Liddie - redirect - Felsen

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1 THE COURT: So why did you send that?

2 If the purpose was to access her GoDaddy account --

3 THE WITNESS: Right.

4 THE COURT: -- why are you sending your e-mail  
5 account?

6 THE WITNESS: I'm not sure. I -- I -- I'm not sure  
7 what -- why it's there. I mean that's --

8 THE COURT: But you wrote it.

9 THE WITNESS: I did write it.

10 THE COURT: What about the customer number? Do you  
11 know customer number that was?

12 THE WITNESS: I believe that's her customer number.

13 THE COURT: All right.

14 Go ahead. Next question.

15 BY MR. FELSEN:

16 Q So the IMELegalReps@gmail.com, that was -- was that  
17 Safa's account that she used?

18 A No. That's mine. That's my e-mail.

19 Q So what was her account?

20 A I believe it was her --

21 Q So they're asking for credentials here and you're giving  
22 them the credentials.

23 THE COURT: For her GoDaddy account.

24 Q You're giving them Safa's GoDaddy credentials and what  
25 you're telling them is IMELegalReps@gmail.com is the user



Liddie - redirect - Felsen

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1 name; isn't that accurate?

2 A I -- I just can't recall. I can't -- I really can't  
3 recall.

4 THE COURT: Well, did you know what her GoDaddy  
5 account user name was then?

6 THE WITNESS: I don't know what her GoDaddy user  
7 name was.

8 THE COURT: Well, you knew it was not that, though.

9 THE WITNESS: No, it's not that. And that wouldn't  
10 be my password for anything, because that -- that -- that's --  
11 that's not a -- that's not -- that a password is not good.

12 THE COURT: But you typed it in.

13 THE WITNESS: No, I typed it to send over because  
14 that was her credentials, her information.

15 THE COURT: Right.

16 THE WITNESS: That was her information.

17 THE COURT: She gave it to you, you typed in an  
18 e-mail and sent it.

19 THE WITNESS: Because they asked for her  
20 credentials.

21 THE COURT: And it didn't dawn on you that, boy,  
22 that is not a password that I would use, so therefore this  
23 account information I am giving them is not correct?

24 That is what you are saying, I think.

25 THE WITNESS: No. So to my understanding, when they



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1 asked for her credentials, was just so that they could start  
2 the migration process. I know the GoDaddy is the host,  
3 obviously, that's not her host GoDaddy. I don't know what her  
4 host GoDaddy name is, I don't know.

5 THE COURT: But that was the purpose, right?

6 THE WITNESS: But I thought -- I never did a  
7 migration of a website, so I was just under the impression  
8 that they needed my e-mail to transfer everything over with  
9 her password.

10 THE COURT: I see.

11 THE WITNESS: I never did a migration before. I  
12 never paid for a website. I never -- I was being guided by  
13 Giant Partners.

14 THE COURT: Okay.

15 Go ahead, Mr. Felsen.

16 MR. FELSEN: I want to show you Exhibit 56.

17 (Exhibit published.)

18 BY MR. FELSEN:

19 Q And in the middle of the page is an e-mail from  
20 April 11th, 2023, and it says: Hi, Conor. Here are the  
21 credentials for the GoDaddy account for Safa at IME Legal  
22 Reps.

23 And then, at the bottom of the page, it's got the  
24 credentials that we just went over from the other e-mail.

25 So how do you explain this, Mr. Liddie?



Liddie - redirect - Felsen

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1 A Yeah. This is my point. This is why I'm trying to  
2 explain. Like, here are the credentials for Safa, because  
3 they asked for her credentials so that they could change the  
4 website over from my company, IME Legal Reps.

5 Q But you're referencing Safa as IME Legal Reps as if she  
6 is IME Legal Reps; isn't that true?

7 A No, that's not what I'm referencing.

8 Q Okay.

9 And what was Safa's credentials for GoDaddy?

10 A That, I don't know. That's all I sent them.

11 Q You -- did you ever e-mail Giant Partners her  
12 credentials?

13 A Just that one e-mail.

14 MR. FELSEN: I'm showing you --

15 A Constant back and forth emailing, like it was constant  
16 back and forth.

17 MR. FELSEN: I'm showing you what was previously  
18 marked as Exhibit 61.

19 (Exhibit published.)

20 THE COURT: Look at the April 25, 2023, e-mail.  
21 Did you send that one?

22 THE WITNESS: Yes, I did. Yeah.

23 Q So it wasn't just one time, correct?

24 A No.

25 THE COURT: And where did you get that information



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1 from?

2 THE WITNESS: From Safa.

3 THE COURT: And how did you get it?

4 THE WITNESS: Over the phone.

5 THE COURT: Do you recall why you sent that if you  
6 thought you had already sent them the information?

7 THE WITNESS: Well, we were still doing the  
8 migration so when I spoke to Estefania, I -- I wish she were  
9 here -- when I spoke to Estefania --

10 THE COURT: In the microphone.

11 THE WITNESS: Sorry.

12 When I spoke to Estefania, I said, you know, I was  
13 just giving her what she was asking so we could complete the  
14 migration.

15 Q The one we're looking at now is for the Companions's  
16 GoDaddy. The other exhibit that we just looked at was for the  
17 IME Legal Reps's GoDaddy, correct?

18 A Yes, I assume so.

19 Q And Safa created all of these user names and passwords,  
20 correct?

21 A Yes -- yes. None of those are my creation. No.

22 Q Now, Mr. Liddie, let me ask you. So I know you testified  
23 that you reviewed all the emails that Giant Partners produced.  
24 There were lots of emails that were directed at Safa and the  
25 emails went to IMELegalReps@gmail.com.



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1                   Were you the one that was reading all those  
2 emails --

3       A       No.

4       Q       -- that were directed to Safa?

5       A       No. So some of the emails I didn't receive at first  
6 because I have my info@IMELegalReps account e-mail and then I  
7 had -- and that's mostly up the majority of the times. And  
8 then I have to click on -- I have to click out of that link to  
9 get to the other e-mail, to pull up the other e-mail.

10               So the majority of the time my info@IMELegalReps was  
11 my -- my main e-mail that I would check because that's  
12 where -- that's where I would get potential, like, leads and  
13 stuff like that, like just, for IMEs.

14               So -- so initially I didn't see those emails when  
15 they were coming through when they kept saying Safa, Safa, but  
16 I was confused by it, because I'm like why would they continue  
17 to say Safa and -- obviously, but I knew it was because we  
18 initially did -- we did like a conference call like the 11th  
19 or 12th of April just of an initial introduction that -- to me  
20 and the team -- that I was actually purchasing the site from  
21 them and we was going to start the migration. And then that's  
22 when I paid the \$7200 on the 12th.

23       Q       Well, Mr. Liddie, why is it that you never corrected  
24 anybody from Giant Partners when they kept sending emails to  
25 IME Legal Reps but referencing Safa?



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1 A That's what I'm explaining to you. Initially, I didn't  
2 see those emails, because I had my info e-mail, that's my main  
3 e-mail source.

4 MR. FELSEN: Okay. Let's -- I'm going to show you  
5 Exhibit 57.

6 (Exhibit published.)

7 THE COURT: You are distinguishing between the  
8 info@IMELegalReps.com versus just IMEReps.com.

9 THE WITNESS: Yeah, like I had two emails. So I  
10 have the emails that I get services, and then I have the  
11 e-mail like, this random, I get general emails.

12 So the IMELegalReps.com, I get general emails.

13 THE COURT: Go ahead.

14 Q So you just opened up this new business that you have no  
15 experience operating and you weren't checking your emails?

16 A I was checking my e-mail.

17 Q You just testified that you weren't.

18 A But I had no reason to check the IMELegalReps.com. I  
19 really had no general reason to check that e-mail.

20 Q But that was your business, though.

21 A Yeah, but I saw it. I mean, I didn't go months without  
22 seeing the e-mail.

23 You're asking me why they continuously submitted  
24 emails saying Safa, Safa, Safa, Safa. To my understanding,  
25 Corey Weissman was the one who worked with Safa but she -- I



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1 had, I guess, her partnership with Giant Partners. When I  
2 partnered with them at that time, Corey referred me to  
3 Estefania, because that was -- I think he was her superior.  
4 He was her supervisor. So she was handling my account.  
5 Estefania Sedano.

6 THE COURT: Let me ask a question while Mr. Felsen  
7 is looking for something.

8 Going back to how you got the Bergman account. You  
9 testified today that Bergman reached out to you, correct?

10 THE WITNESS: The firm, yeah.

11 THE COURT: Apparently, based on some referral, but  
12 you do not know from whom; is that right?

13 THE WITNESS: Yeah.

14 THE COURT: Okay.

15 Do you recall testifying previously under oath in a  
16 hearing before me, I forget, a year ago, I think it was,  
17 May 4th, right?

18 THE WITNESS: Yes.

19 THE COURT: Okay.

20 At that time your testimony about Bergman was, and  
21 this is:

22 QUESTION: Why is it that when you formed IME Legal  
23 Reps you contacted Mr. Bergman?

24 And you answered: When I was initially building the  
25 business, I was going to start in Long Island and just work my



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1 way down to the city.

2 QUESTION: How did you know that Mr. Bergman  
3 operated in Long Island?

4 ANSWER: Through my wife.

5 QUESTION: And your wife works or worked at  
6 IME Companions?

7 ANSWER: Yes.

8 QUESTION: You said you contacted Mr. Bergman  
9 personally.

10 ANSWER: Yes. Oh, no, I contacted the firm first  
11 and then they redirected me to him.

12 QUESTION: So you contacted the main number,  
13 correct?

14 THE WITNESS: Yeah.

15 ANSWER: Yeah.

16 In other words, what you said then was that they did  
17 not spontaneously contact you. You contacted them because  
18 your wife told you about them.

19 THE WITNESS: She told me about them, yeah.

20 THE COURT: Well, which is it?

21 THE WITNESS: No, that's correct. She did tell me  
22 about the firm. But they did call and asked if I had an IME  
23 company and I said yes.

24 THE COURT: Last time you said you affirmatively  
25 contacted them before -- suggesting before they contacted you



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1 because your wife told you about them.

2 THE WITNESS: She did tell me about them,  
3 Your Honor.

4 THE COURT: Okay.

5 But a minute ago you said you do not even remember  
6 who referred Bergman to you and you did not remember that your  
7 wife --

8 THE WITNESS: No, she -- oh, that's what you meant  
9 by referred. She never referred them. She just said that  
10 they're a good firm.

11 THE COURT: But again, who initiated the contact is  
12 where there is also a key difference in what you are saying  
13 today versus last time.

14 THE WITNESS: Got it.

15 THE COURT: Well, which is it?

16 THE WITNESS: Yeah, I did, when they reached out and  
17 asked if I had an IME company, I did say yes and then I called  
18 back, and then I tried several appointments with Mr. Bergman.  
19 That's what I did, I set up the appointment.

20 THE COURT: So your testimony is still the same as  
21 today, which is they contacted you first. It was not you  
22 reaching out to them after your wife told you about them.

23 You see the inconsistency, do you not?

24 THE WITNESS: Yeah, I see what you're saying.

25 THE COURT: Do you remember which it is?



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1 THE WITNESS: I can't recall, sorry, Your Honor.

2 THE COURT: Okay.

3 All right.

4 Go ahead, Mr. Felsen.

5 MR. FELSEN: I am going to show you Exhibit 57.

6 (Exhibit published.)

7 BY MR. FELSEN:

8 Q So we'll start off at the bottom. There's an e-mail sent  
9 by Giant Partners addressed to Safa. And it says: I hope all  
10 has been well. It's great to have you on board.

11 First of all, do you recognize this e-mail?

12 THE COURT: Did you ever see it before?

13 THE WITNESS: Yeah, I did see that before. Yeah.

14 Yes.

15 Yeah, mm-hmm. Yeah, I seen this. I have seen this.

16 Q And there's -- they're inquiring about some questions.  
17 They say: The GoDaddy credentials you provided to Corey are  
18 incorrect. Can you check on those and send over the updated  
19 credentials?

20 And it also says: For IME Legal Reps, can we use  
21 the same colors as IME Companions?

22 And then there's a response from  
23 SafaGelardi@gmailcom to Estefania saying: Let's change it up  
24 a little bit.

25 Do you see that?



1 THE COURT: At the very top of the page dated  
2 April 13th, 2023, at 8:12 p.m.

3 THE WITNESS: Oh, yeah. I see that, yeah. I see  
4 it.

5 Q Do you know why Estefania --

6 A She might have said that. Okay. The only thing I can  
7 think of is she didn't -- she wanted my vision versus hers.

8 So it was -- it was important that I have my own  
9 vision and I not copy her website because it's my business.

10 Q It's your business, so why is Safa communicating with  
11 Giant Partners at this point?

12 A Because they kept including her in the e-mail.

13 Q You testified at the last hearing that you sold -- that  
14 Safa wanted to get out of the business, she wanted to move  
15 away, she was done with this.

16 A Right.

17 Q And she needed a mortgage payment so she sold you the  
18 website for \$4,300.

19 A Correct.

20 Q So why is Safa involved in the middle of April here with  
21 all these emails with Giant Partners?

22 A If you look forward at, I think it was the 19th or the  
23 20th, I did send an e-mail to them once I started working with  
24 -- I believe it's because who she was initially working with  
25 was Corey, was the one messaging. He was the one kept putting



1 Safa in the emails.

2 So I think she was just trying to just, you know,  
3 carry on. I don't know if she was frustrated or what, but I  
4 know she was just trying to get this over with.

5 THE COURT: All right. Let's try this again.

6 The e-mail says below it on April 13, 2023, at 5:43,  
7 and this is from Ms. Sedano: Circling back on Conor's  
8 question for IME sales rep branding, can we use the same  
9 colors as IME Companions?

10 THE WITNESS: Correct.

11 THE COURT: Presumably a question that would have  
12 been directed to you as a person.

13 THE WITNESS: To me.

14 THE COURT: But instead, Ms. Gelardi's responding:  
15 Let's change it up a bit.

16 Were you in on this exchange and can you explain why  
17 it is that Safa Gelardi is responding instead of you, if it is  
18 your business?

19 THE WITNESS: Because I think that these are the  
20 preliminary stages of when we was doing the migration. The  
21 date is the 13th. I think the first time we spoke to them was  
22 the 11th.

23 THE COURT: But what does that have to do with the  
24 migration, which is simply transferring information from one  
25 website to another? This is your business you represent,



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1 right?

2 THE WITNESS: Correct. Correct.

3 THE COURT: So why aren't you the one saying or  
4 directing what the branding is going to look like?

5 THE WITNESS: Right. So -- I did do that.

6 Ultimately, I did do that. On the 19th, I believe it was the  
7 19th or the 20th, I told them that moving forward, if you  
8 could not include Safa in future emails.

9 THE COURT: All right.

10 Do you want to show him the emails in between? It  
11 is up to you, Mr. Felsen.

12 Did you talk to -- let me go back.

13 Did you talk to Ms. Gelardi about this exchange on  
14 April 13th where she is the one saying: Let's change it up a  
15 bit?

16 THE WITNESS: No, I didn't -- I did, yeah, we did  
17 speak about it. And then that's when she was like --

18 THE COURT: What did you say to her?

19 THE WITNESS: No, I told her I'm going to handle  
20 that. Like, I'm going to be the one who do my own website. I  
21 mean, I don't need her to do that. I didn't say nothing.  
22 She's -- so I didn't like challenge her on that, like.

23 I had nothing to hide.

24 THE COURT: Did she say to you, oh, it was my  
25 website and I want to continue my vision? Did she say



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1 anything to you like that?

2 THE WITNESS: No. Absolutely not, no. And I  
3 wouldn't have done that.

4 THE COURT: All right.

5 Go ahead.

6 BY MR. FELSEN:

7 Q So again, Mr. Liddie, why -- Safa sells you the website  
8 and she's done. You testified that she wasn't involved in the  
9 business, so why is she making these important decisions for  
10 your new business?

11 A She didn't make any important decisions. She just wrote,  
12 responded to an e-mail.

13 Q She's counseling --

14 A I'm the one -- I'm the one, if you look -- if you keep  
15 going down and you look at the future emails, I was hands-on  
16 with Estefania with the changing of the website and just the  
17 redesign of the website.

18 Q She's -- she's counseling your web designer as to how to  
19 change things and colors and things of that nature. Why would  
20 she be doing that if she has nothing to do with your business?

21 A You have to ask her.

22 Q You don't know? It's your business.

23 A Yeah, exactly. As you proceed through the emails, I then  
24 said, hey, could you please not involve Safa in my affairs.

25 Q Okay. Let's look at the top of the page here. There's



1 an e-mail from SafaGelardi@gmail.com to Estefania, and it's  
2 requesting that -- it says: Please deactivate  
3 IMECompanions.com. It is very important that the domain  
4 IMECompanions.com be deactivated as soon as possible.

5 IMELegalReps.com has to go up as soon as possible  
6 and when the client books, "we" should get an e-mail to  
7 info@IMELegalReps.com. It is imperative this is done as soon  
8 as possible.

9 Did you discuss this with Safa?

10 A No, I did not discuss that with Safa.

11 Q So are you aware of this e-mail?

12 A No.

13 Q Did you see it prior to today when you got the Giant  
14 Partners's production?

15 A Can you repeat that? Sorry.

16 Q You're copied on this e-mail, aren't you? One of the ccs  
17 is IMELegalReps@gmail.com, right?

18 A Mm-hmm. Mm-hmm.

19 THE COURT: Is this at the time when you were not  
20 looking at your emails?

21 THE WITNESS: Probably. I could have missed it.

22 Q And it references: "We" should get an e-mail to  
23 info@IMELegalReps.com.

24 The "we" is you and Safa and Vito, correct?

25 A No. There's no we.



1 Q It says we.

2 A That's what she wrote. There's no we. I own this  
3 business a hundred percent.

4 (Pause in the proceedings.)

5 THE WITNESS: Your Honor --

6 THE COURT: No, there is no question pending.

7 THE WITNESS: Okay.

8 Q Have you had any meetings with Giant Partners in 2024?

9 A Yeah, I did.

10 Q And what was the purpose of those meetings?

11 A So my website was hacked on March 18th and I reached out  
12 to them, I believe it was the 19th or the 20th, and asked them  
13 if they could repair the website, if possible, because they  
14 were the last people to redesign the website. And they wanted  
15 me to -- because I guess I was out of contract with them, they  
16 wanted me to go into a new contract, which their contracts are  
17 pretty much like marketing contracts. And it's expensive.

18 So I told them -- I declined. Well, actually, I  
19 reached out to Estefania first. She never responded. And  
20 then I sent her an e-mail, she never responded, and then I  
21 actually reached out to Corey Weissman and I had a phone  
22 conversation with him, and that's when he said he wants me to  
23 go into a new contract.

24 Q Now, you testified at the May 4th hearing that you are  
25 the only person who has access to make changes.



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1           You and Giant Partners are the only ones that have  
2 access to change anything on the website for IME Legal Reps;  
3 isn't that correct?

4     A     Yes.

5     Q     So why were you allowing Safa to communicate with them  
6 directly about changes to the website?

7     A     When? When was that?

8     Q     You testified to that last time.

9     A     No, I said when did I do that, as far as allow them to  
10 make changes? Allow her to make --

11    Q     Well, there's emails we just looked at where Safa's  
12 giving them directives with respect to your company's website.

13    A     Correct.

14    Q     So you testified previously that nobody but yourself has  
15 the ability to do that. So why was Safa doing it?

16    A     Well, Safa is here. And I will say this. I don't know  
17 why she was doing that. My only presumption is that maybe she  
18 just didn't want to be tied to me and our websites look  
19 similar. So that's the only thing I could think of. But  
20 other than that --

21           THE COURT: I am going to disregard the speculation.  
22           Could we move it along, guys? It's 5 after 3:00  
23 now. I'll give you two minutes because we with need to talk  
24 about some administrative procedural matters.

25           MR. FELSEN: Just bear with me one minute so I can



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1 just figure out what I want to ask.

2 THE COURT: Mr. Warner, are you going to have  
3 anymore questions?

4 (Pause in the proceedings.)

5 Q Mr. Liddie, you submitted a declaration recently in this  
6 case, correct?

7 A Correct.

8 Q Did Mr. Warner draft that declaration for you?

9 A I drafted it.

10 Q Did -- who asked you to draft a declaration?

11 A I actually spoke to Mr. Warner.

12 Q And what was the nature of that conversation?

13 A It was based on the allegations.

14 Q And did he edit the declaration?

15 A I believe so.

16 Q Have you had e-mail communications with Mr. Warner?

17 A Say that again.

18 Q You have e-mail communications with Mr. Warner about that  
19 declaration?

20 A Just only the e-mail that I sent over to him with the  
21 declaration.

22 THE COURT: But what about changes? Did you discuss  
23 those in emails?

24 THE WITNESS: No, it was over the phone.

25 THE COURT: Okay.



1 Q And you're represented by counsel today, right?

2 A Correct.

3 Q So you did that on your own without your own counsel and  
4 you dealt with Safa's counsel only?

5 A I did, because it was just drafting an affidavit based on  
6 the allegations.

7 Q How much has IME Legal Reps spent on marketing with Giant  
8 Partners?

9 A I never used Giant Partners for marketing.

10 Q So the \$7,200 that you testified you spent previously,  
11 that was exclusively on the website?

12 A That was, yes.

13 THE COURT: The migration.

14 THE WITNESS: That was the migration, yes.

15 THE COURT: All right.

16 THE WITNESS: Because their marketing is a lot more  
17 money.

18 Q And there haven't been any significant changes to the  
19 website from the website that was IME Companions's website,  
20 correct?

21 A There were significant changes.

22 Q What were the significant changes?

23 A The design, the pictures, the imaging. There's a lot of  
24 changes. And I don't even have that website anymore. It was  
25 hacked.



Liddie - redirect - Felsen

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1 Q It was a marketing contract you had with them, though,  
2 right?

3 A No. They wanted -- it was -- the contract was for the  
4 migration and then if I chose to use the marketing, then they  
5 was going to give me a different price.

6 Q So you previously testified that they redesigned the  
7 whole website to your vision.

8 So what was your vision with respect to the website  
9 and what did they actually do to meet that vision?

10 A My vision is running an honest business with integrity  
11 and servicing clients.

12 Q So the marketing contract you had with them, that's --  
13 that's -- that's the \$7,200 that you paid, and you didn't pay  
14 anything else?

15 A That was their price.

16 Q Now at the last hearing, Judge Chen warned you about the  
17 injunction that was in place, correct?

18 A Yes.

19 Q And she said you should not rely on recommendations from  
20 Jeff Beibin about clients, correct?

21 A Correct.

22 Q And she did so because Mr. Beibin is an agent of  
23 Companions and the Gelardis, correct?

24 MR. WARNER: Objection, Your Honor.

25 THE COURT: Overruled.



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1 Is that what you recall?

2 THE WITNESS: I was going to answer.

3 THE COURT: Yes, please.

4 A Yeah, he previously worked for them, yes.

5 Q And Judge Chen also warned you at the last hearing that  
6 you could end up back here in court based on a claim by IME  
7 WatchDog that you violated the injunction, correct?

8 A Correct.

9 Q After Judge Chen denied IME WatchDog's motion following  
10 the May 4th hearing, you and Safa were emboldened to proceed  
11 with continuing the business of IME Companions, correct?

12 A No. Incorrect.

13 Q Judge Chen told you that you should build a record for  
14 how you develop customers on your own, correct?

15 A Correct.

16 Q And she warned you that the record you build for how you  
17 develop customers should not be relying on Mr. Beibin, and I  
18 quote from the record: Certainly not the Gelardis themselves.

19 Isn't that true?

20 A Correct.

21 Q And you're not prepared to offer any evidence today about  
22 how you developed customers other than just cold-calling on  
23 your days off; is that correct?

24 A So every law firm that I go to, I get their information  
25 as well. So they always give me a card and I keep those



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1 cards. So that's -- I have them. They're at home. But I  
2 keep every card that I get from every law firm.

3 Q Other than business cards, you don't have any e-mail  
4 communications, text messages, any type of marketing material  
5 that you've issued to potential customers; is that correct?

6 A Yeah, so I have my flier in my folder, some pens, my  
7 business cards. I do send a follow-up e-mail. I thank you  
8 for your time, appreciate meeting you. I just remind you my  
9 name is Eugene Liddie, and I just give them a little more  
10 information about me that I couldn't give them in person,  
11 because everybody's busy.

12 THE COURT: All right, folks. We have to wrap this  
13 up. It is already 3:10 now.

14 So last question.

15 MR. FELSEN: Okay.

16 Could I just confer one second with my client?

17 THE COURT: Yes.

18 (Pause in the proceedings.)

19 MR. FELSEN: One more exhibit.

20 THE COURT: One more exhibit, one more question,  
21 folks. I really have to be somewhere else soon. So let's  
22 wrap this up.

23 MR. FELSEN: Okay.

24 I'm showing you Exhibit 64.

25 (Exhibit published.)



Liddie - redirect - Felsen

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1 BY MR. FELSEN:

2 Q This is an e-mail from Corey Weissman at Giant Partners  
3 to Safa and yourself.

4 In the second it says: I hope all is well with you.  
5 I wanted to check in and see if you have any updates regarding  
6 the marketing for IME Legal Reps. We were waiting for your  
7 response on May 15th regarding the Court date you mentioned  
8 and we hope to hear from you soon.

9 And by the way, this is a June 1st, 2023, e-mail.

10 A May 30th.

11 THE COURT: It says May 30th.

12 MR. FELSEN: I'm sorry.

13 THE COURT: 2023.

14 That one says June 1.

15 MR. FELSEN: The top one is June 1st, that is the  
16 one I was just reading, I think.

17 Q So the court date, what is Mr. Weissman referring to with  
18 respect to a court date?

19 A That's not me. Mr. -- I never worked with Mr. Weissman  
20 other than a couple phone calls on the initial preliminary,  
21 when I first spoke to him, with Safa, and then when I just  
22 reached back out to him. I didn't get in contact with  
23 Estefania. That's probably a discussion he had with Safa  
24 Gelardi. That's not a conversation he had with me.

25 And he's, once again, he's tying me in the



1 communication with Safa because he worked with Safa. He never  
2 worked with me. I worked with Estefania.

3 THE COURT: So is it your testimony that all the  
4 communications from Mr. Weissman, even if they included you by  
5 name or on the e-mail, were not directed at you, but were  
6 intended for Ms. Gelardi?

7 THE WITNESS: No. What I'm saying is because she  
8 introduced us and he cannot contact me, he's including her  
9 because you see in the e-mail, if you go back down, it says:  
10 Can you call Eugene, like --

11 THE COURT: But is this e-mail that we are looking  
12 at, the June 1, 2023 one, intended for you or for her?  
13 Because you just said the court date information is not about  
14 you.

15 THE WITNESS: But he wants to speak to me because  
16 they're a marketing company, so what they want to do is they  
17 want me to spend more money to market.

18 THE COURT: I am sorry, the second sentence says:  
19 We were waiting for your response on 5/15 regarding the court  
20 date you mentioned.

21 That, you said, just a moment ago, that is not  
22 relevant.

23 THE WITNESS: That's what I'm saying. He cc'd Safa  
24 Gelardi on here. He didn't just send me an e-mail to IME  
25 Legal Reps. He cc'd her. He sent it to her, too.



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1 THE COURT: But it is addressed to you and Safa.

2 I guess I am just trying to clarify, because you  
3 said a second ago that you did not correspond or communicate  
4 with Mr. Weissman about your business.

5 THE WITNESS: You got it, correct, yes.

6 THE COURT: So this e-mail, even though it talks  
7 about IME Legal Reps, which is your business --

8 THE WITNESS: Correct.

9 THE COURT: -- is not directed at you? It is  
10 directed at Ms. Gelardi?

11 THE WITNESS: I think -- what I'm saying is I  
12 believe she -- she worked with him so I think she had a  
13 discussion saying, hey -- I don't know what she possibly  
14 talked about with him.

15 THE COURT: I am sorry. Hang on.

16 It says: I hope you're well. I want to check in  
17 and see if you have any updates regarding the marketing for  
18 IME Legal Reps.

19 Your company.

20 THE WITNESS: Correct.

21 THE COURT: Okay.

22 THE WITNESS: Because he's under the presumption  
23 that I'm going to use their marketing, which I never was.

24 THE COURT: I see, okay.

25 So you think he thinks he is talking to you and to



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1 Safa about your company's marketing, but --

2 THE WITNESS: I think he's tying Safa in because he  
3 cannot get in contact with me.

4 THE COURT: All right.

5 So is your testimony still that you never had a  
6 working relationship with Mr. Weissman --

7 THE WITNESS: I didn't, yeah.

8 THE COURT: -- because you did not do any marketing  
9 with Giant Partners?

10 THE WITNESS: No, it was because I didn't -- well, I  
11 didn't do any marketing with Giant Partners. But my  
12 relation -- he referred me to Estefania, and that's who was  
13 managing my account.

14 THE COURT: Okay.

15 THE WITNESS: So that's why who I reached back out  
16 to when the website was hacked.

17 THE COURT: Go ahead.

18 BY MR. FELSEN:

19 Q Based on the fact that Giant Partners was emailing both  
20 you and Safa, isn't it true that they perceived that both of  
21 you were operating --

22 MR. WARNER: Objection, Your Honor.

23 THE COURT: Sustained. Calls for speculation. Or  
24 it is just argument.

25 Okay. That is it. Done.



1 MR. FELSEN: Thank you, Your Honor.

2 THE COURT: Let's talk about the document requests.

3 You can step down, Mr. Liddie. Bear in mind, you  
4 will get served probably again with a document request and  
5 this time you have to respond to it.

6 THE WITNESS: Okay.

7 THE COURT: Or risk some potential sanction. You  
8 understand that.

9 THE WITNESS: Okay.

10 (Witness excused.)

11 MR. FELSEN: Your Honor, may I hand it to him now?

12 THE COURT: Yes. Go ahead.

13 Consider yourself served.

14 I do not know what deadline is indicated in there,  
15 but, obviously, Mr. Liddie, if you need to negotiate the  
16 deadline for the production, do that with the lawyers.

17 MR. KATAEV: We will do it, Judge Chen.

18 THE COURT: All right.

19 So what else do we need to deal with before we  
20 resume the hearing with the deposition excerpts from Giant  
21 Partners?

22 MR. KATAEV: Just logistically speaking, we're going  
23 to have myself, and Mr. Felsen perhaps, with one of us being  
24 the witness and one of us being the lawyer reading from  
25 transcript as if we're the people being deposed.



1 THE COURT: Okay.

2 So, Mr. Warner, you had suggested in your letter you  
3 were going to submit declarations from witnesses who were  
4 available or are available technically but did not appear. As  
5 you know, I am not accepting any declarations for available  
6 witnesses, witnesses who could have appeared and are  
7 subpoenaable, but did not show up. I assume that is a problem  
8 for both sides, but I am not taking any declarations.

9 I am only allowing the Giant Partners's witnesses to  
10 have their testimony introduced via the deposition because  
11 they are unavailable pursuant to the Federal rules and,  
12 therefore, they do not have to appear this person, but their  
13 testimony is obviously important with respect to the emails  
14 that we have been looking at and the nature of the  
15 relationship between Ms. Gelardi, Giant Partners and  
16 Mr. Liddie, okay?

17 MR. KATAEV: One other thing, Your Honor.

18 THE COURT: Yes.

19 MR. KATAEV: We're exploring the availability of a  
20 video deposition. If we do have a video deposition, would the  
21 Court prefer a video instead of us reading?

22 THE COURT: I would prefer it.

23 MR. KATAEV: Okay. We will see what we can do.  
24 We're working with the attorney for Giant Partners on that.

25 THE COURT: Yes. I would much prefer that so I



1 could see the witness testify.

2 MR. KATAEV: Okay.

3 THE COURT: Do you know who that witness will be?

4 MR. KATAEV: We believe it's the COO, I believe his  
5 name is Sheldon, S-H-E-L-D-O-N, Katz.

6 THE COURT: But not Mr. Weissman or Ms. Estefania?

7 MR. KATAEV: We're working on getting Mr. Weissman  
8 as well.

9 MR. FELSEN: Your Honor, it was served as a 30(b)(6)  
10 so it's possible there may be multiple deponents.

11 THE COURT: All right.

12 So I am going to let you all go. We will see you  
13 all again on whatever the next date is. I do not want receive  
14 any more filings from anybody for any reason, period,  
15 understood? You folks have just submitted way too many  
16 things. This is not necessary.

17 I will see you in a couple weeks. You will make  
18 your arguments then about the various motions that are  
19 pending.

20 Let me quickly address your motions for  
21 reconsideration, Mr. Warner.

22 I am not granting either of them. I have to tell  
23 you, the first one I think is borderline specious. The one  
24 where you argue that Ms. Gelardi should not be found in  
25 contempt with respect to contact with Mr. Roa, because while



1 she hired an investigator for the purpose of contacting  
2 Mr. Roa, the investigator bungled the operation and never  
3 actually contacted Mr. Roa as the word plainly means. That is  
4 your argument. That is just frivolous.

5           The point is, she knowingly tried to violate the  
6 order. The fact that it was unsuccessful is not a reason not  
7 to find her in contempt. The act of hiring someone, of going  
8 to such great lengths to hire an investigator to follow  
9 Mr. Roa, and to try to strike up a conversation with him by  
10 way of getting information or for whatever purpose, was  
11 completely in violation of my very explicit order of NO  
12 contact, direct or indirect, between the defendants and  
13 Mr. Roa. So I am not reconsidering that finding of contempt.

14           As to the second basis. I am, quite honestly, not  
15 sure what exactly you mean in terms of they were not on  
16 notice. I think your concern was that the issue about  
17 Ms. Gutierrez being used effectively by the defendants to  
18 continue IME Companions's business, albeit under a different  
19 name, what came up in the middle of a hearing, but I do not  
20 find that there was anything unfair about that process. You  
21 certainly had ample opportunity to marshal whatever contrary  
22 evidence I should have seen or made any arguments or  
23 submissions you could have, and you have not done so.

24           There is nothing that contests the actual facts, the  
25 ones that were elicited during the hearing, at which your



1 clients were represented. And obviously, they know the facts  
2 better than anyone with respect to how Ms. Gutierrez and the  
3 others ended up doing the same business that IME Companions  
4 was doing.

5 If you have any other evidence that you think,  
6 because of the process that was used that was not considered,  
7 that goes to that issue, then alert me to that, but simply  
8 crying foul about how it came up spontaneously during the  
9 course of an evidentiary hearing at which your clients were  
10 represented is not going to be a basis, as far as I am  
11 concerned for reconsidering that finding because it was based  
12 on the evidence put before me. If you have any other  
13 evidence, let me know.

14 MR. WARNER: Thank you, Your Honor.

15 THE COURT: All right.

16 Thank you, everything.

17 MR. KATAEV: Sorry. Two quick procedural questions.

18 THE COURT: Yes.

19 MR. FELSEN: In lieu of supplemental briefing, which  
20 I understand the Court doesn't want, can the parties prepare  
21 summations at the end of the June 17th hearing?

22 THE COURT: I will hear summations from you. But  
23 again, do not belabor anything.

24 Hold on one second.

25 MR. KATAEV: And the final question.



1 THE COURT: Hold on.

2 (Pause in the proceedings.)

3 MR. KATAEV: And the final question, Your Honor, is  
4 originally this hearing was scheduled to address multiple  
5 motions, such as the attachment and attorneys's fees. To the  
6 extent the Court wants the parties to provide any argument or  
7 briefing -- I'm sorry, argument or support for anything, would  
8 the Court let us know what the Court is looking for?

9 THE COURT: About the attachments, you mean.

10 MR. KATAEV: Attachment, contempt, original contempt  
11 motions, instead of this one, and the attorneys's fees motion.  
12 Because my understanding was the original hearing date was set  
13 to discuss all of those pending motions. That's what the  
14 order references.

15 THE COURT: That is correct. So the ones that are  
16 in play are still the attachment, the original contempt  
17 motion.

18 MR. KATAEV: Attorneys's fees.

19 THE COURT: Attorneys's fees. I have dealt with the  
20 two reconsideration motions.

21 I will deal with one more, which has to do with the  
22 argument that Vito Gelardi should not be held in contempt  
23 along with his wife.

24 I am rejecting that argument as well, based on what  
25 I heard today, both from Ms. Gelardi and Mr. Gelardi, about



1 the fact that they were jointly involved in IME Companions.  
2 Mr. Gelardi was the CFO and had responsibility for managing or  
3 monitoring or dealing with the financial wherewithal and  
4 decisions relating to the company, even though his testimony  
5 spiralled into some inconsistencies that I did not credit.

6 But it is clear to me that they were linked in  
7 together running this business based on some of the emails I  
8 saw, based on his conduct, and quite honestly, based on some  
9 of his responses, which made it clear to me that he and his  
10 wife, just as she said, were partners in life and in business.

11 So I am rejecting that argument, as well, that  
12 Mr. Gelardi should not be the subject of the prior contempt  
13 finding, which is one of the other motions I think filed by  
14 the defense.

15 That leaves the questions about the subpoenas, I  
16 think, and the failure to respond, but it sounds like  
17 Mr. Liddie will do so now that he has received it.

18 And then there is a question about the outstanding  
19 bill that is owed to Berkeley Research Group. I will await  
20 some other testimony and think about that further.

21 But so far I will tell you this, Mr. Warner, I am  
22 not convinced that somehow your clients do not have the  
23 ability to pay that based on their holdings alone. They have  
24 a property that is apparently going to be sold for about 900  
25 some thousand dollars. It is hard for me to imagine that one



1 could not pull out some equity from that property, even if it  
2 does not sell, but I do not know all the financial information  
3 so I will wait for that.

4 If your clients want to rely on indigence as their  
5 inability to pay as the reason for not paying it, you are  
6 going to have to provide some financial information; bank  
7 records, tax records, and they have to be provided to  
8 plaintiff as well so that they can challenge those. You can  
9 redact personal sensitive information such as Social Security  
10 numbers, dates of birth, but I want to see that documentation.

11 I am just not going to accept the representation of  
12 your clients that somehow they cannot pay the  
13 30-some-thousand-dollar bill, especially when I have seen  
14 evidence that they were paying a lot more money for these  
15 purported marketing services around the same time, if not  
16 shortly before and after.

17 So those are sort of your marching orders. I will  
18 see you folks at the next conference, and again, please do not  
19 file anything more. I am not going to read it.

20 Okay.

21 ALL: Thank you, Your Honor.

22

23 (Matter adjourned to Monday, June 17th, 2024.)

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I N D E X

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